

# East Devon District Council The New East Devon Local Plan 2006 to 2026



Consultation  
Draft Plan  
(Dec 2011)

East Devon District Council



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## **Preface**

### **By Paul Diviani – Leader of East Devon District Council**

East Devon District Council has spent the past five years gathering data and consulting with the community as it works towards a new Local Plan. This new Local Plan contains draft planning policy through to 2026 and we want to ensure that East Devon remains an outstanding place to live, work and play.

We all know and love the outstanding environment of East Devon and this is one of the reasons so many of us choose to live here. From the spectacular Jurassic Coast, through the rural landscapes of our Areas of Outstanding Natural Beauty, we are truly blessed with wonderful surroundings. The stunning landscapes of East Devon support a diverse range of wildlife habitats and species and sites of national and international wildlife importance. These natural features are complemented by a rich heritage of fine historical buildings that define our towns and villages. The plan sets out how we will conserve and enhance these outstanding assets.

The environmental qualities of East Devon are, however, only one part of the story. Our District is - and must remain - a living and working area and one where visitors and residents can enjoy our open spaces. We therefore need to plan for new jobs and homes. Our plan shows where development should take place, how many homes are to be built and the sites where new jobs can be created to help our local communities thrive and prosper. We need to deliver a sustainable working legacy for future generations.

In many parts of East Devon future growth will be modest in scale, but we are not shying away from big initiatives. In East Devon's West End we are planning for major strategic world-class development. Development at Cranbrook is now underway and efforts in delivering this self-sufficient, low-carbon new town – the first stand-alone settlement in Devon since the Middle Ages – have won national acclaim. A sustainable community located close to real employment opportunities, among them a significant number of highly-skilled jobs, will be an exemplar for green travel. Other major initiatives that we are tackling include the expansive regeneration of the coastal resorts of Exmouth and Seaton and promoting housing and commercial development in other towns.

From 1 December 2011 to 31 January 2012, we are conducting a Public Review of the latest document, produced after many months of evidence-gathering by Officers and hours of painstaking discussion by Councillors.

We welcome your comments.



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## **SETTING THE CONTEXT**

The new East Devon Local Plan will set out where development in East Devon will occur and how we will protect and enhance our great natural assets. The opening chapters of the plan will set out the context for the policies that follow. After the context setting chapters the plan falls into three parts:

- Part One – Will be the Strategic policies of the plan.
- Part Two – Will be the local or Development Management Policies of the Plan.
- Part Three - Will set out how we will encourage local communities to get involved in Neighbourhood Plan production and other local planning initiatives.





## 1. Introduction

- 1.1 The new East Devon Local Plan will help set out what we want East Devon to be like in the years to come, the type of development we want to see and where it should occur and what benefits it will bring to our communities.
- 1.2 Over recent years we have undertaken considerable amounts of consultation and used feedback to produce this report. The responses we receive to this consultation will help determine what our final plans will look like.

### **Making Comments on this Report and to Find out More**

- 1.3 We welcome comments from all individuals and organisations. For reasons of openness all comments received and the name of individuals and organisations making comments will be open for anyone to read on our website, though at this stage of consultation we will also accept anonymous comments and record them as coming from 'anonymous'.
- 1.4 To comment on and find out more information please see our website at:  
<http://www.eastdevon.gov.uk/localplan>  
to see more about the work of the LDF/Local Plan Panel please see:  
[http://www.eastdevon.gov.uk/index/your\\_council/councillors\\_and\\_meetings/local\\_development\\_framework\\_panel\\_mins.htm](http://www.eastdevon.gov.uk/index/your_council/councillors_and_meetings/local_development_framework_panel_mins.htm)
- 1.5 You can also submit comments in written/letter format to:  
**Planning Policy Section**  
**East Devon District Council**  
**Knowle, Sidmouth. EX10 8HL**
- 1.6 Or email us at:  
[localplan@eastdevon.gov.uk](mailto:localplan@eastdevon.gov.uk)
- 1.7 All comments must be received by the Council by:

**5 p.m. Tuesday 31<sup>st</sup> January 2012**

### **The New Planning System and Our New Local Plan**

- 1.8 The Government is introducing a new planning system for England. Legislation and guidance coming into force in 2012 will require new style Local Plans. These new Local Plans will supersede and replace the Local Development Framework Plans, including Core Strategies that were part of the planning system of the previous government. We want to be 'ahead of the game' when it comes to new style Local Plans and for this reason we are producing this consultation draft of the New East

Devon Local Plan now rather than waiting for all legislation to be passed. We can and will adapt plan and context as and when we know full details of the new system, but changes are likely to need to be minor and we are confident we are on the 'right track'.

- 1.9 The Core Strategy and broader Local Development Framework work we have done to date will not be wasted. It will provide fundamental evidence, research and information to inform our future plans.

### Work Undertaken to Date and the Next Stages

- 1.10 Some of the key tasks undertaken to date are set out below.

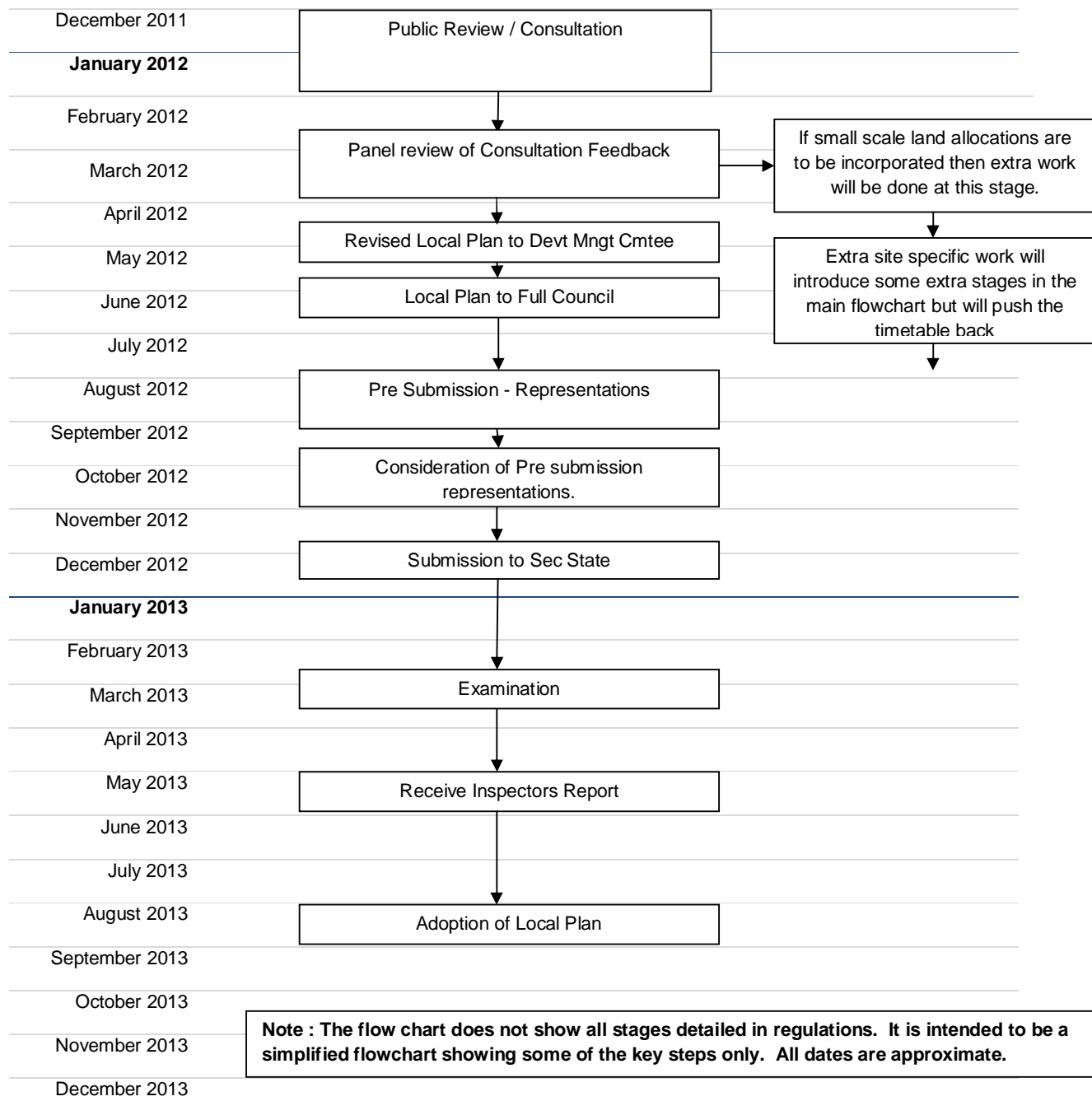
**Table 1 - Some of the Key Stages in East Devon Local Plan Production to Date**

Stage	Date	Commentary
Evidence Gathering	Ongoing and will continue	All plans need to be informed by evidence and research. Evidence has been gathered to inform this and future policy documents. This work will continue.
Member and Parish Council Workshops	2007	In 2007 the Council held a series of workshops with Members and Parish Councils looking at potential planning policy options.
LDF Issues and Options Consultation report	2008 and 2009	In late 2008/early 2009 the Council produced and consulted on an Issues and Options report. This set out possible options for future growth and development in East Devon and invited responses to a series of questions. Over 400 individuals/organisations responded to this consultation.
LDF Blackhorse/ Redhayes Consultation	2009	In 2009 the Council undertook a follow on Issues and Options consultation specifically in respect of development potential on land at Blackhorse/ Redhayes (near to Exeter).
Engagement with Town and Parish Councils and Other Key Stakeholders	2010	In the Spring of 2010 the Council undertook a further series of workshops and engagement events with various community bodies and representatives in East Devon to inform further work on the Core Strategy production.
Preferred Approach Consultation	Autumn 2010	This Council issued a Preferred Approach document for public consultation.
Additional Consultation and Evidence Gathering	Autumn 2010 / early 2011	Throughout late 2010 and early 2011 the Council has undertaken additional consultation and evidence gathering, where necessary, to inform and support the Local Plan preparation.

## **A Staged Programme for Local Plan Production**

- 1.11 The new Local Plan will be consulted on and potentially produced in a series of stages. This first stage of consultation concentrates on strategic policies and strategic allocations, and development management policy wording (but not development management policy boundaries). The intention is that future stages of Local Plan work and other planning initiatives, specifically to include Neighbourhood Plans, will help define local policy boundaries.
- 1.12 We will welcome comments on the policies set out in this plan and whether policies should be in the strategy section or the development management section. We also recognise the fact that many respondents will also wish to comment on local policy boundaries and smaller sites they consider should be allocated or identified for development (or perhaps specifically identified as NOT being suitable or appropriate for development).
- 1.13 Our aspiration is that we will not need/choose to make boundary changes to policy through the current collection of Local Plan work and that the first stage of the new Local Plan will proceed through to Examination and adoption as drafted (subject to wording changes/refinement through consultation and following examination).
- 1.14 We hope that Government legislation, will allow us to produce the New Local Plan on a staged basis. With defining the local boundaries to which policies apply being a second stage of plan work. Legislation may not however, allow for this, therefore we will need to retain some flexibility.
- 1.15 We do not envisage seeking to enter the formal 'submission stages' of plan making until new legislation is finally confirmed and production of new style Local Plans is enshrined in law. If legislation is significantly delayed and other matters change we will review what plans we produce and when we will produce them. It is unlikely but we could revert to producing a Core Strategy as was required under the previous Government's planning regime. Work done to date and the consultation exercise we are planning would not be wasted as Part One of our consultation document mirrors what a Core Strategy could look like. The Development Management policies proposed in part two of our document mirror what a Development Management Development Plan Document could look like. We will be undertaking consultation that is therefore relevant to production of both a new style Local Plan and also a Core Strategy and a Development Management Development Plan Document (under what will in due course be the old legislation).
- 1.16 If we cannot produce the Local Plan in two parts then we will programme in extra work. We will need to undertake site assessment and consultation work. There will be requirements for site specific Strategic Environmental Assessment and we may need to undertake a site specific consultation exercise in the Spring of 2012. We will need to consult on boundaries and sites. The preferred sites and boundaries following consultation will then be inserted into the rest of the Local Plan document and the submission stages of plan production will proceed.

- 1.17 In planning to produce the Local Plan on a staged basis it will allow local communities to take the lead on local planning work for their area and produce Neighbourhood Plans. Where local communities do plan to produce Neighbourhood Plans they will be able to set out the sites in their areas that they wish to see allocated for development. The proposed future stages in plan production are timetable below.



## **The Future Role of the current East Devon Local Plan**

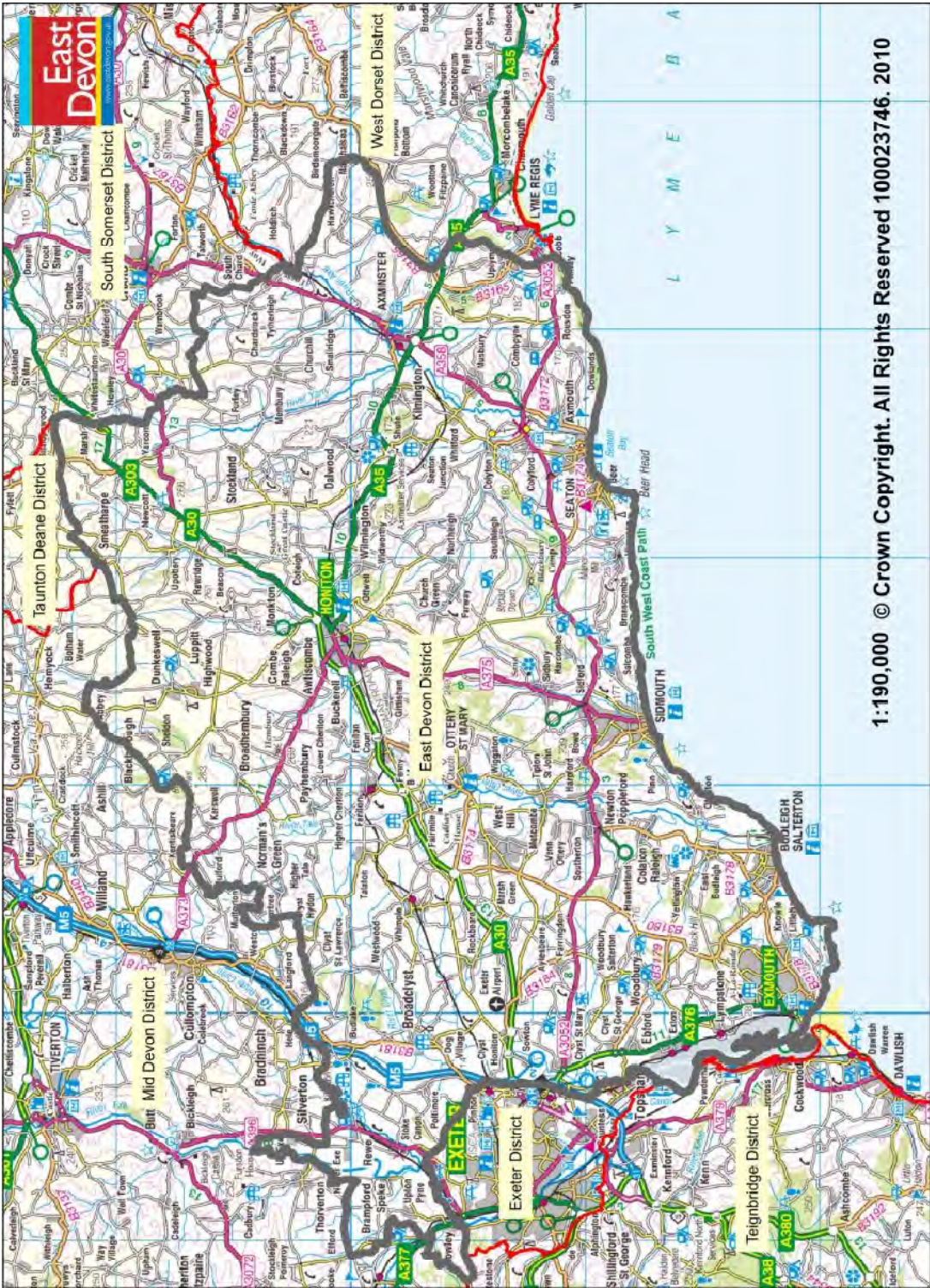
- 1.18 The current East Devon Local Plan forms the primary planning policy document under which the Council currently operates. It technically covers the 1995 to 2011 period, however its proposals and policies will, for the most part, remain operational until superseded by our new Local Plan and/or legislation ‘abolishes’ it.

**TO MAKE COMMENTS ON CHAPTER 1:  
INTRODUCTION visit:  
[www.eastdevon.gov.uk/draftlocalplan1](http://www.eastdevon.gov.uk/draftlocalplan1)**





## 2. Portrait of East Devon



## **Pen Portrait of East Devon**

- 2.1 Our new Local Plan will cover the whole of East Devon and we felt it useful to present an overview of the District. East Devon covers around 81,477 hectares (315 square miles), and is of roughly average size for Districts in the South West. However it has one of the higher District population levels (132,700 persons 2009 midyear estimate). The Eastern and Northern boundaries of East Devon abut rural parts of Devon, Dorset and Somerset. The Southern boundary of the District is formed by the English Channel. The Western boundary of East Devon abuts the commercially vibrant city of Exeter and the environmentally sensitive Exe estuary.
- 2.2 There is enormous variety in East Devon. The District encompasses urban and urban fringe areas as well as market towns and villages, seaside towns and remote rural and coastal areas. There are seven towns in East Devon with population levels exceeding 3,000 people plus many villages and hamlets. Exmouth is the largest town in East Devon with a population of around 36,000 (2009 midyear estimate 35,763) people. Measured by area the vast majority of the District is undeveloped countryside mostly in agricultural uses though land under woodland and forestry accounts for a sizeable minority of the District as does heathland and inter-tidal areas associated with the District's rivers and estuaries.
- 2.3 There are, on average, around 2.17 people living in each household. Over recent years household sizes have been getting smaller. There are more deaths than births in the District and the population increase in the District occurs because of inward migration largely from elsewhere in England.
- 2.4 East Devon is characterised by an elderly population profile. This is most noticeable amongst the 60/65 plus age groups and reflects the popularity of the District as a retirement destination, especially the coastal areas. Around 30% of the East Devon population is retired, compared with a South West figure of around 20% and an England figure of around 17%. The coastal towns of East Devon (Seaton, Sidmouth, Budleigh Salterton and Exmouth) have a particularly elderly population profile.

## **How East Devon Should Change**

- 2.5 The portrait above tells us a little about how East Devon is now but not what it should or will be like in the future. In the rest of this document we set out our policies for the future but we need your help and input by telling us whether you support these proposals or would prefer us to take a different approach.

**TO MAKE COMMENTS ON CHAPTER 2:  
PEN PORTRAIT OF EAST DEVON visit:  
[www.eastdevon.gov.uk/draftlocalplan2](http://www.eastdevon.gov.uk/draftlocalplan2)**



### **3. Vision for East Devon to 2031**

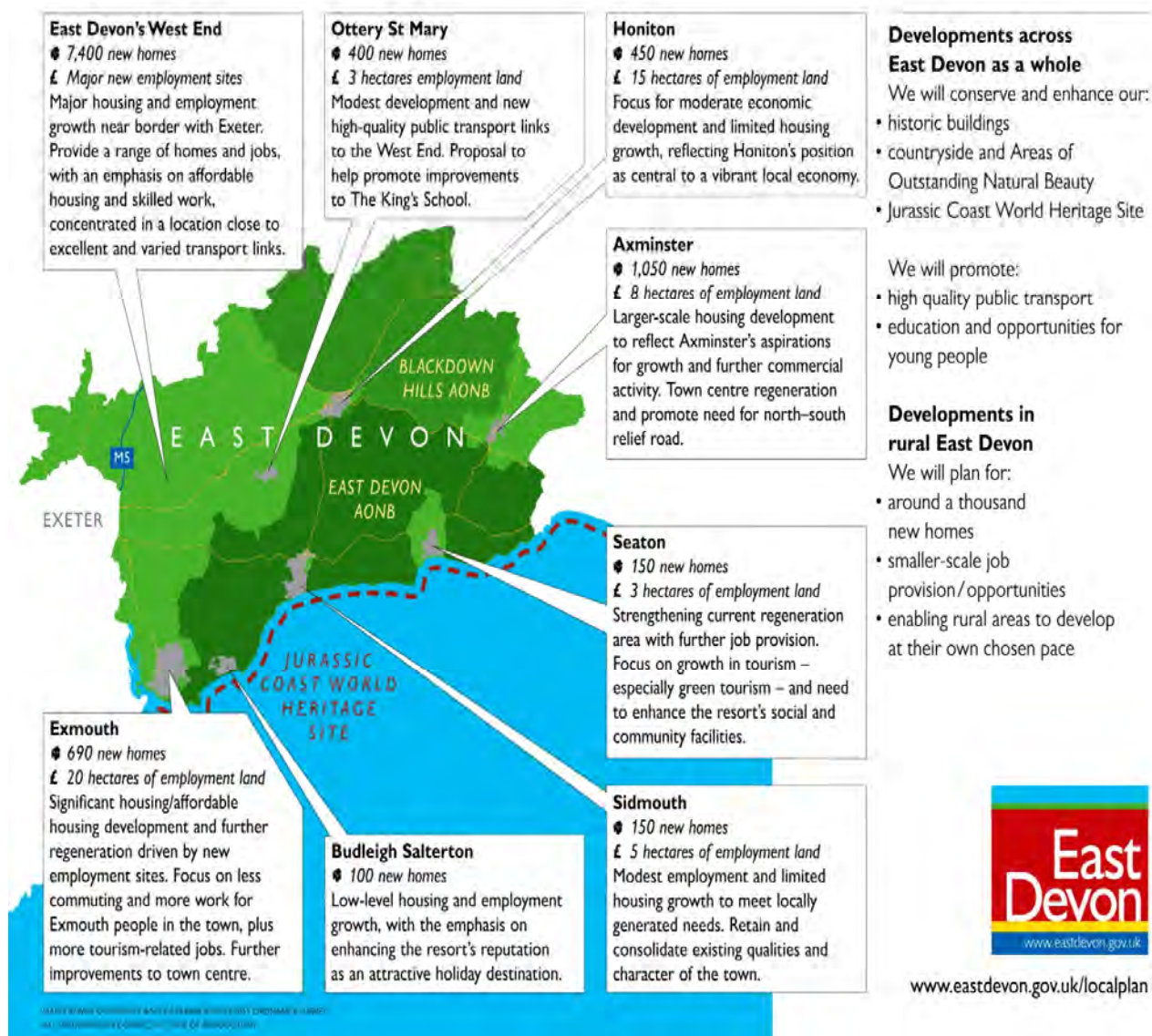
- 3.1 The Local Plan will help shape East Devon in the years ahead. As a starting point to help us tackle the challenges we face over the next 20 years we have created a Vision statement to sum up our aims. The vision is aspirational but also it is rooted in realism. We welcome your comments on whether you think we have got it right.
- 3.2 This set of strategic policies is developed in a worldwide climate of downwardly revised forecasts, wildly gyrating stock markets, reducing consumer discretionary expenditure and weak business confidence. In addition we have Government policies altering in major ways.
- 3.3 We intend this Local Plan to keep East Devon as an outstanding place to live environmentally, a place where job creation is raising average income and where homes will become more affordable. Affordable homes are a top priority for this Council.
- 3.4 This means our plans for strategic allocations for housing and workspace will be sited in the best places to create the jobs and homes. We will safeguard the rural country and coastal for the enjoyment of residents and visitors. We will also increase expectations for green space and sports' space in towns.
- 3.5 Our close working relationship with Exeter is creating not only a new town at Cranbrook but a critically important cluster of employment land, science park and airport with multimodal freight terminal to reduce the carbon load on the environment.
- 3.6 Our strategic allocations and policies will ensure that each community and settlement in East Devon will retain its distinctive character by careful attention to Local Plan allocations and Development policies. The towns of Exmouth and Axminster will grow. The other towns and villages will grow in lesser numbers but most housing growth will occur at the West End of the District and inside the Exeter border at that point.
- 3.7 We have a priority to develop Brownfield sites first except at the West End and to protect grade 1 and 2 farmland wherever possible to sustain local food production. We also aim to encourage more local jobs to cut down commuting by cars. Transport and infrastructure will require considerable partnership to improve East Devon. Employment Land growth will be at the West End growth sites and along the A303, with some growth in Exmouth to help diversify the business sectors in all areas. In this way we aim to narrow the gap between wages and house prices, so that better jobs and more affordable homes are provided by the private sector.
- 3.8 The current regulations on plan preparation are set out in the Town and Country Planning (Local Development) (England) Regulations 2004, as amended and will be altered by the Localism Act 2012 and subsequent publication of a foreshortened National Planning Policy Framework. We will amend the proposed planning guidance wherever appropriate to gain the objectives we have set out for local people.

- 3.9 East Devon will play its part in boosting the economy of the Exeter sub-region by encouraging significant growth within the West End of the District through:
- allocating Cranbrook, a prototype 'eco-town' new community, plus urban extensions East of Exeter
  - promoting the Exeter Science Park, Skypark, an inter-modal rail freight depot, and the expansion of Exeter Airport; encouraging high technology industries and opening up our market and coastal communities to the latest technological innovations
  - facilitating the change to a low carbon economy and supporting an advanced public transport system to connect the main employment sites with established and new communities.
- 3.10 East Devon will provide for more balanced communities where homes and jobs are in better alignment by:
- providing major employment, housing and community facilities in Exmouth; vital housing growth at Axminster, with more modest growth at Budleigh Salterton, Honiton, Ottery St Mary, Seaton and Sidmouth
  - finding creative solutions to meeting affordable rural housing and employment needs
  - ensuring services are provided to meet the changing needs of an ageing population by maintaining and supporting services that can be delivered locally.
- 3.11 East Devon will protect, enhance and conserve its outstanding natural environment which contributes to the economic and social wellbeing of its communities by:
- protecting existing open space and areas designated for environmental purposes as well as protecting and conserving the undesignated countryside
  - requiring that new development includes open space to meet locally defined targets (refer EDDC Open Spaces Strategy)
  - requiring that development makes links to the surrounding countryside (refer Green Infrastructure policy)
  - seeking to create an ecological network.
- 3.12 In delivering growth at the market and coastal towns and rural communities the challenge will be to provide all the necessary facilities whilst protecting East Devon's outstanding quality of life and very special environment. This includes the World Heritage Coast site, as well as the Blackdown Hills and East Devon Areas of Outstanding Natural Beauty. The key is to respond sensitively to the needs for more balanced communities without damaging the environmental qualities that we cherish. The local distinctiveness of East Devon in both landscape and building traditions will be supported and we will set the agenda and design standards for future progressive development.
- 3.13 We will support a strong and viable agricultural sector in East Devon, focused on:
- helping local food production
  - maintaining food security and home supply

- The rural economy will be a varied one, widening the options for providing jobs and promoting the different attractions (both natural and man-made) that East Devon has to offer.

3.14 We have set out our key spatial vision plan, the Key Diagram, for East Devon. It contains many of the key themes referred to throughout this document.

### At-a-glance guide to the latest development proposals



## The East Devon Sustainable Community Plan

3.15 The East Devon Sustainable Community Plan has 7 themes each with a priority for action as set out below:

- **Housing in East Devon:** Ensuring a good quality affordable home is available to far more residents in the district and that each home is adequate in size and suitably located for the occupants.
- **Economic Development:** Increasing opportunities for raising average income through regeneration.
- **Protecting and Enhancing the Environment:** To seek to improve access, value, quality and use of our local environment in order to improve the physical and mental health of local communities.
- **Inclusion and Access:** To target community support work into those geographical areas where we have recognised difficulties.
- **Keeping Healthy and Independent:** Positive mental health (it is a fundamental requirement upon which other aspects of health and social improvement rely).
- **Culture & Leisure in East Devon:** Maintaining and improving upon opportunities for social networking and integration.
- **Community Safety:** Tackling anti-social behaviour.

## What Other Service Providers are Proposing

3.16 One of the jobs of the planning system is to provide a clear picture to public, private and voluntary bodies about proposals for future development. This will give other organisations the opportunity to design their plans and proposals around the changes we plan. We, as a Council also need to understand what other organisations are planning as we will want to tie our proposals into schemes and proposals that they plan to bring forward.

## East Devon Corporate Plan

3.17 East Devon District Council is preparing a new Corporate Plan and this will be consulted on during the Winter 2011/12 period. This plan and strategies for environment, housing and the economy will inform the final new Local Plan.

**TO MAKE COMMENTS ON CHAPTER 3:  
VISION FOR EAST DEVON TO 2031 visit:  
[www.eastdevon.gov.uk/draftlocalplan3](http://www.eastdevon.gov.uk/draftlocalplan3)**

## 4. Key Issues and Objectives

### What Influences East Devon Now

- 4.1 There are many positive things about East Devon. We have listed some of these below under thematic headings:
- a. **Jobs and Economic Growth** - East Devon is an attractive environment for enterprise witnessed particularly by the number of thriving small businesses. We have a vibrant tourism industry and some high quality jobs particularly in the Western part of the District with good access to the Exeter work market too. As a District we have low unemployment rates.
  - b. **Housing** - East Devon boasts extremely attractive towns and villages with good quality housing, including many fine historic properties.
  - c. **Balanced Communities** - East Devon has a healthy living environment and healthy population. Facilities in the District's towns (and some larger villages) are good and crime levels are low. We have good schools and friendly people.
  - d. **Transport** - East Devon has an extensive road network and our towns have reasonably good public transport. We have two main line rail links, with trains giving direct access to London. We have a vast network of footpaths and a growing cycle route network. Congestion and traffic jams are rare in East Devon except for some roads into Exeter or on the edges of the City.
  - e. **Carbon Emissions & Climate Change** - East Devon offers a wide ranging potential for renewable energy generation. There are current proposals for a flagship combined heat and power plant to serve Cranbrook and other eco-friendly initiatives in the District.
  - f. **Biodiversity** - East Devon has a rich and varied range of species and habitats, many nationally and internationally important wildlife sites and significant opportunities for people to enjoy the natural world.
  - g. **Green Infrastructure and Recreation** - the green spaces of East Devon's countryside and its extensive coastline ensure that we have an abundance of open and informal recreation space.
  - h. **Landscape, AONBs and the Coastal Zone** - East Devon has landscapes of stunning quality, our largely undeveloped coastline forms a part of England's only World Heritage site designated for geological reasons. We have two AONBs which together cover two thirds of the District.
  - i. **Built Heritage** - East Devon is rich in built heritage. It has high quality, beautiful villages and towns, and many listed buildings, displaying the wide range of local building materials.

**TO MAKE COMMENTS ON CHAPTER 4:  
KEY ISSUES AND OBJECTIVES visit:  
[www.eastdevon.gov.uk/draftlocalplan4](http://www.eastdevon.gov.uk/draftlocalplan4)**



## 5. Policy Context and Public Engagement

### The Plans that Inform our Work

- 5.1 The new Local Plan will not exist in isolation from other plans. It will need to conform with a wide range of policy guidance established at an international, national and local level. One of the jobs of the District Council is to interpret guidance and policy and apply it to the local level. In some cases legislation and guidance is clear about what is required of the Council and there is limited local flexibility. In most cases however, there is a good degree of flexibility in terms of what we can do. The Government's Draft National Planning Policy Framework provides flexibility to promote sustainable development for East Devon. We must accommodate development but we can determine how, where and why.

### The 'Localism' Agenda

- 5.2 Under the current Government there are very clear messages about local people making local decisions about how and why their home places should change and therefore what development should happen. In the way we work as a Council we need to be responsive to the views of Parish Councils, local neighbourhoods and other local area bodies and organisations. Part Three of this new style Local Plan concentrates specifically on Neighbourhood Plans.
- 5.3 The Decentralisation and Localism Act will come into operation in early 2012. This new legislation will be of key importance as it will be the law that informs and with which our new Local Plan will comply.

### Other Legislation, Guidance and Policy

- 5.4 Some of the key documents that the Local Plan will need to comply with or acknowledge include:
- **National Legislation** - current and future legislation sets out many issues and steps and stages plans need to follow. (There is also relevant EU legislation and Directives but in most cases they have been translated into British/English law and procedures);
  - **Government Circulars and Regulations** – these advise on the implementation of legislation and Government Policy setting out technical considerations and procedural requirements;
  - **National Planning Policy Framework** – In 2011 the Government set out a slimmed down guidance document for consultation. Once approved it will supersede existing Government Policy Guidance;
  - **Good Practice Guidance** – the Government and other bodies produce guidance on plan making and proposed plan content;
  - **Exeter and Heart of Devon Economic Development Strategy**;
  - **Devon Local Transport Plan**; and

- **Neighbouring Authorities' plans.**

## **Sustainability Appraisal and Habitat Regulations**

- 5.5 Our Local Plan must be subject to Sustainability Appraisal. The role of Sustainability Appraisal (and under separate legislation Strategic Environmental Assessment) is to assess the potential impacts of alternative options. The Sustainability Appraisal will inform policy choices and detailed aspects of policy wording and how mitigation, if needed, can be best achieved. At the last stage of plan making, the Core Strategy Preferred Approach report, we published a sustainability appraisal document<sup>1</sup> that assessed proposals. This report can be viewed on the Council web site the findings have been used to help inform this draft local plan and are referred to in the plan. We will be undertaking a sustainability appraisal of this plan and publishing findings in due course.
- 5.6 As a separate exercise the Council is undertaking Habitat Regulation Assessment work. Habitat Regulations are concerned with the potential adverse impacts that development could have on the best and most significant wildlife sites. Sites designated under European legislation and include the Exe Estuary, the Pebblebed Heaths, the River Axe corridor and the coastline between Seaton and Lyme Regis are included. An initial Habitat Regulations Screening report has been produced and published.<sup>2</sup> This report clearly shows that any development that could lead to extra visitor pressure on the Exe Estuary or the Pebblebed Heaths would be likely to have adverse nature conservation impacts unless mitigation measures are put in place. Further more fine grained work is now being undertaken on these key environmental assets to more fully understand the nature and scale of adverse impacts and identify appropriate forms of mitigation.

## **Exeter and East Devon New Growth Point**

- 5.7 Exeter and East Devon's West End were recognised as a New Growth Point by the previous Government in 2007. New Growth Points are areas that will see high levels of housing and employment development. Recognition as a growth area enables the Council to work in partnership with other organisations to secure the financial support that will allow very ambitious housing and employment levels to be met.

## **Why and How We Have Listened to the Public**

- 5.8 The rules and guidance above form the 'top-down' element of our work but of increasing importance has been and will be listening to local community wishes and aspirations for their areas. It is essential for our future planning work that we understand what people have said to us through public engagement and consultation.

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<sup>1</sup> The Sustainability Appraisal can be read in full: Land Use Consultants for EDDC (2010) "Core Strategy Preferred Approach Sustainability Appraisal"

<sup>2</sup> As footnote 1 above.



- 5.9 Feedback reports from past consultations can be viewed on the Council website<sup>3</sup>. These include feedback on the LDF Issues and Options report and also on the LDF Core Strategy Preferred Approach Report.

**TO MAKE COMMENTS ON CHAPTER 5:  
POLICY CONTEXT AND PUBLIC ENGAGEMENT  
visit:  
[www.eastdevon.gov.uk/draftlocalplan5](http://www.eastdevon.gov.uk/draftlocalplan5)**

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<sup>3</sup> The Issues and Options report and the Preferred Approach report can be viewed on the Council's website on the Planning Policy pages:  
<http://www.eastdevon.gov.uk/planning-newpage-4> and <http://www.eastdevon.gov.uk/planning-newpage> respectively



## **PART ONE – THE STRATEGIC APPROACH AND STRATEGIC POLICIES OF THE LOCAL PLAN**

This part of the Local Plan sets out strategic policies. These policies set the strategy for the rest of the plan and are of key relevance in the determination of planning applications. When considering a planning application the Council will assess whether the proposal accords with the strategic policies and will then look at the proposal in the light of the more detailed development management policies of the plan. See Part Two of the plan for development management policies. It should be noted that if a Neighbourhood Plan is produced it must be in accordance with and apply these strategic policies but it can supersede or overwrite any of the development management policies in Part Two of the Plan. See Part Three of the Plan for Neighbourhood Planning.



## 6. Spatial Strategy

6.1 This section sets out details of the overall strategy (or big picture) for development in East Devon for the years ahead including how many new homes will be built, where development will be located and how the District's outstanding natural environment will be protected and enhanced.

6.2 Feedback and evidence is set out below:

### **What you said about the strategy for development:**

- The majority of respondents to the Issues and Options report favoured having most development in existing urban areas. There was some support for allowing growth in villages to conserve amenities and services, to enhance self containment and to support local needs;
- A number of respondents questioned whether initial proposals at Cranbrook would be built and suggested instead more growth at Exmouth, Ottery St Mary, Honiton and other towns.
- At the Issues and Options stage we asked whether in the 'rest of East Devon' the Council should aim to provide more dwellings than the Regional Spatial Strategy had proposed and about a quarter of respondents agreed with this approach, while just over half supported aiming to meet, but not exceed, the RSS requirement.
- Consultation showed there is support for growth at each of the main towns and some villages. There was however, only limited support for very substantial development.

### **What the sustainability appraisal and evidence tells us about the strategy for development:**

- Development should be focused on areas that have the greatest amount of services, employment and public transport. The District's main towns largely meet this criteria.
- The Devon Structure Plan sets out policy for an urban focused approach to development.
- The Sustainability Appraisal supports a strategic approach to planned growth, to ensure that transport, open space, jobs and renewable energy provision can all be co-ordinated with the building of new homes.
- The Habitat Regulations Assessment identifies where and how much development may impact badly on important wildlife and habitats and where action may be needed to lessen or make up for any such damage.

6.3 We will focus major development in East Devon's West End although growth is also planned for the towns of East Devon. Villages and rural areas will see lower growth levels and development primarily focused on meeting local needs. This approach is consistent with past Devon County Council Structure Plan policies.

6.4 The South-Eastern part of Devon, centred on the City of Exeter and surrounding areas in East Devon, Mid Devon and Teignbridge, has seen substantial development and strong economic performance in recent years despite the national recession. This

overall growth pattern is set to continue; with development in the West End of East Devon playing a key part, Cranbrook will be a thriving, attractive and bustling new town.

- 6.5 Towns, villages and the rural communities help define the character and special qualities of East Devon. We recognise that without some development many towns and villages will increasingly become communities of the retired and wealthy commuters travelling ever longer distances to work. The Council will aim to ensure that East Devon is an outstanding place to live in, work in and enjoy, with social and community facilities and jobs, whilst remaining appealing places to live. Development, particularly affordable housing and provision of jobs, in towns and villages will help sustain, enhance and make them self supporting places to live and work where people will have access to amenities and services and enjoy their leisure time.

### **Consultation Local Plan – Draft Strategy 1**

#### **Overall Spatial Strategy for Development in East Devon:**

Planned provision (including existing commitments) will be made in East Devon for around:

1. Around 15,000 new homes in the 2006 to 2026 period ; and
2. Development on around 180 hectares of land for employment purposes of which 106 hectares is already available/committed to development (including 65 Hectares at the West End) and 74 hectares will come forward through additional allocations (20 hectares of which will be at the West End).

The overall spatial development approach is as set out below:

1. East Devon's West End will accommodate significant residential development (around 50 % of new homes) and major employment development to attract strategic inward investment along with supporting infrastructure and community facilities.
2. The seven main towns of East Devon will form focal points for development to serve their own needs and the needs of surrounding rural areas. They will accommodate around 40 % of new homes built in East Devon.
3. The Local Plan will set out how development in smaller towns, villages and rural areas will be geared to meeting local needs. Around 10% of new homes will be built in these areas.

### **Rejected Options**

- 6.6 The following alternatives to the above preferred approach were rejected:
1. **A dispersed pattern of development with more new homes spread across East Devon** - this would be contrary to past plans and received little public support and would increase commuting.
  2. **Reducing or substantially reducing the amount of development at Cranbrook and the West End and distributing this to other settlements** - this would be contrary to long standing strategic policy which favours housing growth at locations close to where people work and identifies that major strategic employment development (as opposed to smaller scale indigenous business growth) would occur in what we have termed 'East Devon's West End'.

## Employment Provision

- 6.7 The Local plan will seek to increase the supply of new employment opportunities in East Devon. A key means for achieving this end will be to identify suitable land for employment uses.
- 6.8 East Devon's West End will be a focal point for job provision with a particular focus on encouraging strategic inward investment. We are allocating 20 hectares of additional employment land in the West End which will be in addition to sites with planning permission that already exist for development of the following proposals:
- Land at Cranbrook - 5 hectares already committed.
  - Land at Science Park - 25 hectares already committed.
  - Land at Skypark - 40 hectares already committed.
- 6.9 This scale of growth will provide flexibility in terms of potential sites that can come forward. It will help secure big strategic investment opportunities, smaller business provision, airport related business expansion and new jobs at major mixed use residential development sites. It will not however, 'flood the market' with inappropriate sites that could undermine the plan strategy and frustrate potential for strategic site choices to be developed.
- 6.10 In the rest of East Devon employment provision will mostly be geared to serving local needs with a view to securing jobs close to existing homes so that people have the option of not needing to commute long distances to work. Local employment provision will be made at East Devon towns with an expectation that larger scale housing allocations will be matched with new jobs (around 1 for each home built) for their future residents. We estimate that, roughly speaking, 250 new homes could generate the need for around 1 hectare (or 2.5 acres) of employment land. We will take a broad view of the types of activity (retail, commercial, industrial, service sector) that can be classed as 'employment' in making our land allocations; we do however see future B1 employment development (office developments), and jobs in this class, as being key. Tabulated below are the proposed employment allocations, levels of development have been informed by a future needs assessment.<sup>4</sup>

### Proposed Employment Allocations

Location	Built 1995 to 2011	Approx Available/Committed – Hectares	Strategic Allocations – Hectares	Non Strategic Allocations – Hectares	Notes and Commentary
Axminster	4	3.5 (the actual available supply is 8 hectares, however see note)	8	0	A strategic allocation of 8 Ha is proposed to the East of the town as part of a site that incorporates 650 homes. The 8 Ha will supersede 4.5 Ha of land allocated as a current Millwey Rise expansion site and added to it will be the approximate 3.5 ha figure derived from the future needs assessment.

<sup>4</sup> EDDC (2011) "Report on Employment Land Provision"

<b>Budleigh Salterton</b>		<b>0</b>	<b>0</b>	<b>0</b>	Budleigh has a relatively low need and given the environmental constraints of the town and lack of evidence for demand it is not proposed that allocations are made. Land can, however, come forward through windfall sources.
<b>Exmouth</b>	<b>3</b>	<b>2</b> (the actual available supply is 10 hectares, however see note)	<b>16</b>	<b>4</b>	There is an employment led regeneration agenda proposed for Exmouth and employment and allocations are a reflection on the need to reduce out-commuting through employment growth and promote self containment for the settlement. Strategic allocations are made at Liverton (Ph 2 and 3 – 11 Ha) and Goodmore's Farm (5 Ha). Liverton Phase 2 provides for 8 Ha and does have planning permission but it is featured in the strategic allocations columns.
<b>Honiton</b>	<b>7</b>	<b>7</b>	<b>15</b>	<b>0</b>	Need in Honiton would suggest a modest new provision. However the new Local Plan sets out a growth agenda for the town and to serve surrounding areas/ the District as a whole. It is proposed that a substantial strategic employment allocation is made at Honiton.
<b>Ottery St Mary</b>	<b>0</b>	<b>4</b>	<b>3</b>	<b>0</b>	A strategic allocation for Ottery St Mary will be provided in the West of the town. Increased employment provision will provide local jobs and encourage economic vibrancy within the settlement.
<b>Seaton</b>	<b>0.3</b>	<b>4</b>	<b>0</b>	<b>3</b>	Seaton will not have a strategic employment allocation but it is proposed that 3 Ha of land is bought forward through the plan. The provision of employment land in Seaton will help reduce out commuting and provide local jobs. Consultation feedback noted the need for employment premises and in particular for starter units.
<b>Sidmouth</b>	<b>0.4</b>	<b>1</b>	<b>0</b>	<b>5</b>	There is no strategic allocation for Sidmouth and the amount of employment land required is to satisfy local need and reflects feedback from previous consultations. Site/s will need to be identified at a later stage in the plan process.
<b>West End</b>	<b>2</b>	<b>65</b>	<b>15</b>	<b>5</b>	The committed land at the West End is made up of Science Park (25 Ha) and Skypark (40 Ha). The Intermodal interchange covers a site area of around 44 hectares but on account of its unique nature as part of the transport infrastructure is not counted as an employment site/in employment land calculations. The new West End allocations comprise of 15 hectares at Cranbrook (which includes the 5 hectares allocated in the current adopted Local Plan) and a 5 Hectare non-strategic provision to provide for the future expansion of Exeter Airport Business Park.
<b>Hill Barton</b>	<b>3</b>	<b>12</b>	<b>0</b>	<b>0</b>	This Includes two sites of 3.2 Ha and 8.6 Ha respectively.
<b>Greendale</b>	<b>3</b>	<b>7</b>	<b>0</b>	<b>0</b>	This includes six sites.
<b>Totals</b>	<b>22.7</b>	<b>105.5</b>	<b>57</b>	<b>17</b>	<b>Total = 179.5 Hectares of which 105.5 is already committed and 72 hectares will come forward through strategic allocation sites and non-strategic provision.(Total does not include 22.7 as this is already built)</b>



## **Housing Provision**

- 6.11 The opportunity for people to live in a decent home is fundamental to achieving an inclusive society and is a key aim of housing and planning policy as well as being a priority for the District Council. We will set out plans for future housing provision in East Devon and monitor how many houses are being built and whether they are meeting our needs, especially for affordable housing. We will review our housing provision and through this work manage future levels of development to meet housing needs.

## **Phasing of Development**

- 6.12 It is proposed that the Local Plan will have four phases covering the 2006 to 2026 period. Each phase will last for five years:
1. 2006/07 to 2010/11 - this first phase is nearing completion;
  2. 2011/12 to 2015/16;
  3. 2016/17 to 2020/21;
  4. 2021/22 to 2025/26.
- 6.13 The phasing program will ensure that the plan will run for the next 15 years. It is envisaged that the plan will need to be reviewed and amended on a regular basis.

**Consultation Local Plan – Draft Strategy 2****Scale and Distribution of Development in East Devon:**

Future Development in the 2006 to 2026 period will be accommodated in accordance with the pattern of distribution tabled below/on the next page. Separate location specific/town chapters expand on the reasons, strategic objectives and justification for proposed levels of development.

	A	B	C	D	E	F
Settlement (as defined by Built-up Area Boundaries)	Dwellings Built 2006/07 to 2010/2011 (by town Council areas)	Net Commitments With Planning Permission or Under-construction at 2011	Site that have made significant progress through planning - including existing Local Plan Allocations but at 31 March 2011 did not have planning permission	Proposed New Local Plan Strategic Allocations	Proposed New Local Plan Housing to be allocated after further work on smaller site identification	Total
<b>East Devon's West End - Totals</b>	<b>0</b>	<b>2,900</b>	<b>450</b>	<b>4,050</b>	<b>0</b>	<b>7,400</b>
Cranbrook	0	2,900	0	3,100	0	6,000
Pinhoe	0	0	450	350	0	800
North of Blackhorse	0	0	0	600	0	600
<b>Area Centres - Totals</b>	<b>1,180</b>	<b>1,700</b>	<b>735</b>	<b>1,690</b>	<b>900</b>	<b>6,205</b>
Axminster	211	365	546	650	0	1,772
Budleigh Salterton	30	36	0	0	100	166
Exmouth	482	391	137	540	150	1,700
Honiton	95	117	0	150	300	662
Ottery St Mary	56	9	0	350	50	465
Seaton	98	438	0	0	150	686
Sidmouth	208	344	52	0	150	754
<b>Villages &amp; Rural Areas - Totals</b>	<b>512</b>	<b>284</b>	<b>0</b>	<b>0</b>	<b>770</b>	<b>1,566</b>
<b>Grand Totals</b>	<b>1,692</b>	<b>4,884</b>	<b>1,185</b>	<b>5,740</b>	<b>1,670</b>	<b>15,171</b>

## 6.14 Notes on the Table:

- Dwellings Built – this indicates net new homes built in the past 5 years. The data is derived from Parish based records. For most towns it will give a clear indication of past development though for Ottery St Mary and Sidmouth, in particular, it will slightly over-estimate development levels. Rural totals will give a slight under-estimate.
- With Permission / Under Construction – These are net new dwellings that had permission (not started) or were under-construction at 31 March 2011.

- c) These are sites we were aware of at 31 March 2011 that are reasonably well advanced through the planning process and expected in due course to get a permission – they were/are -

Webster Garage Site, Axminster	Axminster	AX015 (25 units) - Webster Garage Site, Axminster . The Local Plan allocates 25 units to Websters Garage Site. However it has a potential capacity that is higher.	25
Axminster Football Club	Axminster	Proposals exist for 71 units on the existing football club site.	71
Land at Cloakham Lawns	Axminster	Permission was granted, but subject to legal challenge, for 450 homes.	450
West of Coomb Hayes, Woolbrook, Sidmouth	Sidmouth	SD006 (21 units) - West of Coomb Hayes, Woolbrook, Sidmouth	21
Fortfield Hotel site	Sidmouth	Proposals exist for a scheme of 31 dwellings	31
Former Hillcrest School, Exmouth	Exmouth	Former Hillcrest School, Exmouth - Potential Capacity estimated at 67 dwellings	67
Former University of Plymouth, Rolle College Campus, Exmouth	Exmouth	Former University of Plymouth, Rolle College Campus, Exmouth Potential Capacity estimated at 70 dwellings	70
Land at /near/adjoining Pinhoe	Near Pinhoe	A resolution to grant permission for 450 homes subject to 106 legal agreement being signed	450

- d) Strategic allocations – these are larger scale sites that are seen as key to delivery of the strategy of the plan for any given town or locality.
- e) Smaller site allocations – future Local Plan work and work on Neighbourhood plans will identify locations for development at these sites. They are not proposed for identification in the current stages of work.

**General Overarching Note:** All figures are a first assessment only at this stage of work (as at October 2011) and need refining. In some cases they will show gross development levels and translation into net provision will result in reductions being made. In addition there is some potential for double-counting and also some permissions counted in the assessment may have not been built and will have now expired. A non-implementation rate is not applied. The grand total should be considered as an upper estimate to a 31 March 2011 base date. However post 31 March completions and new commitments will add to total provision and will be incorporated into an update assessment.

## Rejected Options

- 6.15 The following alternatives to the above preferred approach were rejected:
1. **Lower levels of housing growth at Cranbrook and the West End** - would not accord with the approach taken in the most recent Devon Structure Plans.
  2. **Lower levels of housing growth in the rest of East Devon** - would provide insufficient market or affordable housing to meet local needs.
- 6.16 Existing planning policy defines Built-up Area Boundaries (sometimes called 'development' or 'settlement' boundaries or just 'black lines') around the towns and many of the villages of East Devon. We plan to retain the Built-up Area Boundaries for the vast majority of settlements. However, **for some villages we are proposing that boundaries will not be retained.** These are:
- **Alfington, Exton, Raymond's Hill and Rewe** - which are villages with very few facilities and/or limited community support for growth;
  - **Clyst Honiton** - which is under the flight path for Exeter Airport and the whole village lies within a noisy environment (technically it is within the 57dBA noise contour) where Government advice is that planning permission for dwellings should not normally be granted;
  - **Stoke Canon** - where almost all the village is within Floodzone 3 and Government guidance is to direct development to lower flood risk areas.
- 6.17 Built-up Area Boundary modifications will be considered through future stages of policy production. The Built-up Area Boundaries serve two primary functions:
- a) They set limits for outward expansion of settlements and in so doing control the overall scale of development that occurs in order to ensure consistency of approach with plan strategy and development distribution. They prevent unregulated development across the countryside and open areas;
  - b) They define (within the boundary) locations where many development types, in principle, will be acceptable because they will complement objectives of promoting sustainable development.
- 6.18 Beyond Built-up Area Boundaries some forms of development will be permitted. For example at villages (including those without boundaries, but where they have a range of facilities) mixed use development of market and affordable housing will be permissible. The development management policies of the Local Plan will provide more details of this and other development types relating to employment, recreation and other uses that can be acceptable under specified circumstances.

## **Sustainable Development, Balanced Communities and Securing Employment, Social and Community Facilities**

6.19 Feedback and evidence is set out below:

### **What you said about Sustainable Development and Balanced Communities:**

- The consultation exercises have generated lots of comments around 'sustainability' issues. We felt it important to set out policy on sustainable development.

### **What the sustainability appraisal and evidence tells us about Sustainable Development and Balanced Communities:**

- The sustainability appraisal work advises on key sustainability considerations against which proposals and policies can be measured.

6.20 As overarching guidance we have set out below what we mean by sustainable development and balanced communities and how these terms relate to housing, employment, demographic considerations and social, educational, commercial and community facilities. As a starting point for thinking about sustainable development we consider that the report of the World Commission on Environment and Development of 1987 (often referred to as the Brundtland report) provides the best opening definition:

***“Development that meets the needs of the present without compromising the ability of future generations to meet their own needs”.<sup>5</sup>***

### **Consultation Local Plan – Draft Strategy 3**

#### **Sustainable Development:**

The objective of ensuring sustainable development is central to our thinking. We interpret sustainable development in East Devon to mean that the following issues and their inter-relationships are taken fully into account when considering development:

- a) **Conserving and Enhancing the Environment** - which includes ensuring development is undertaken in a way that minimises harm and enhances biodiversity and the quality of the landscape.
- b) **Prudent natural resource use** - which includes minimising fossil fuel use therefore reducing carbon dioxide emissions. It also includes minimising resource consumption, reusing materials and recycling.
- c) **Promoting social wellbeing** - which includes providing facilities to meet people's needs such as health care, affordable housing, recreation space and village halls.
- d) **Encouraging Economic development** - which includes securing jobs.
- e) **Taking a long term view of our actions** - Ensuring that future generations live in a high quality environment where jobs, facilities, education and training are readily available.

<sup>5</sup> Brundtland Commission (1987) “Report of the World Commission on Environment and Development: Our Common Future”

## **Consultation Local Plan – Draft Strategy 4**

### **Balanced Communities:**

By balanced communities we mean that in any area or neighbourhood there is a match between the jobs, the homes and the educational, social and community facilities. Ideally also in the range of ages in the resident population. Key components of a balanced community include:

- a) **Securing employment provision across East Devon** - this should reduce the need for commuting - where housing is proposed we will require new job provision.
- b) **Securing social, health and community and educational facilities** - these facilities play a central part in community life and new housing should help secure their provision and keep the community vibrant and viable.
- c) **Getting more age-balanced communities** - many East Devon communities have an overtly aged population profile. Where this is the case we will encourage residential development that will be suited to or provide for younger people and younger families.

### **Rejected Options**

- 6.21 The following alternatives to the above preferred approach were rejected:
- 1. **Not seeking to promote sustainable development or not referring to it** - we could rely on national policy and guidance on sustainable development definitions but would underplay its importance and does not allow us to apply a local interpretation.
  - 2. **Not seeking to define 'balanced communities'** - again we could rely on national guidance. However, we feel it is important to stress the relevance of the key facilities that help make communities positive and vibrant places to live and work.
- 6.22 The Local Plan recognises the unique and outstanding quality of East Devon's environment, the need to conserve and enhance our internationally and nationally important sites, as well as our network of locally important community green spaces.
- 6.23 The natural environment is also a key driver for the district's economy, generating income for local businesses directly involved in tourism as well as the District's coastal and market towns with direct visitor spend. The contribution of the natural economy is critical to the economic well being of the whole of the district and therefore the conservation and enhancement of the natural environment is of considerable importance.

## **Consultation Local Plan – Draft Strategy 5 Environment**

All development proposals will contribute to the delivery of sustainable development, ensure protection and enhancement of natural and built environmental assets and geodiversity.

Open spaces and areas of biodiversity importance and interest will be protected from damage, and the restoration, enhancement, expansion and linking of these areas to create green networks will be encouraged through a combination of measures such as;

- 1) Maximising opportunities for the creation of green infrastructure and networks in sites allocated for development;
- 2) Creating green networks and corridors to link the urban areas and wider countryside;
- 3) The designation of Local Nature Reserves and County Wildlife Sites;
- 4) Minimising the fragmentation of habitats, creation of new habitats and connection of existing areas to create an ecological network that is identified within the East Devon District Council Local Biodiversity Plan;
- 5) Progress towards delivering the Biodiversity Action Plan targets and Local Nature Reserve Strategy;
- 6) Conservation and enhancement of Sites of Special Scientific Interest (SSSI) in accordance with the Wildlife and Countryside Act.

New development will incorporate open space and high quality landscaping to provide attractive and desirable environments for new occupants and wildlife. It will contribute to a network of green spaces. Where there is no conflict with biodiversity interests, the enjoyment and use of the natural environment will be encouraged and all proposals should seek to encourage public access to the countryside.

### 6.24 How we reached policy:

The Core Strategy Preferred Approach document was subject to high levels of objection in respect of the location of some proposed development but especially the overall scale of development (particularly new homes).

On the basis of considering objections we appointed Roger Tym and Partners to undertake a housing and employment study. We have considered the conclusions of their work as well as considering other studies and assessments<sup>6</sup>. In the light of these studies and assessments we consider it reasonable to lower overall planned housing growth from 16,400 dwellings in the Preferred Approach document to a level of around 15,000 dwellings. It is not regarded as credible to go below this level as it would be:

1. Contrary to evidence of need and demand we have received

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<sup>6</sup> The Roger Tyms report can be accessed through our website:

[http://www.Eastdevon.gov.uk/combined\\_East\\_devon\\_employment\\_study\\_draft\\_final\\_report\\_251011.pdf](http://www.Eastdevon.gov.uk/combined_East_devon_employment_study_draft_final_report_251011.pdf)

2. Contrary to existing policy documents and their evidence
3. Not help to play our part in meeting for future development needs for the local and wider area.
4. Run counter to Government objectives for more growth and leave the Council very vulnerable to being found unsound at Examination. Also this leaves us vulnerable to having development imposed upon us in a manner we do not consider appropriate.

By planning for this scale for development the Council is actively going to plan for sustainability and to meet the needs in an appropriate and locally determined manner. The strategy section of the plan has been bolstered through reference to the importance of sustainable development and through policies in respect of environmental issues – thus more fully recognising the worth, value and significance of the environment of East Devon.

**TO MAKE COMMENTS ON CHAPTER 6:  
SPATIAL STRATEGY visit:  
[www.eastdevon.gov.uk/draftlocalplan6](http://www.eastdevon.gov.uk/draftlocalplan6)**



## **7. Development of East Devon's West End**

### **The Sub-Regional Housing and Employment Provision**

- 7.1 East Devon's West End (part of the Exeter and East Devon Growth Point along with land in Exeter City and Teignbridge) is about to see the creation of very large development to be built to the highest level of sustainability. This area is poised to deliver unprecedented levels of growth over the next twenty years and could attract over a billion pounds worth of investment. The West End will host a world class science park, a major business park, a number of new low carbon communities with mixed use housing, social, community and commercial facilities hotels, and also a major training centre for the aviation industry<sup>7</sup>.
- 7.2 The Growth Point area will accommodate a whole spectrum of businesses, from start-ups to major corporations, including science, technology, retail, construction, green technology, manufacturing, aviation, engineering, and power generation. A ground-breaking energy scheme is to serve the Skypark Business Park and Cranbrook new community. We will see the UK's first mass open market community with a combined heat and power district heating system and significantly increase the sustainability rating of both residential and employment developments. Buildings in the growth point area will be designed to the highest sustainability standards with a remit to create eye catching locally distinctive buildings which offer low carbon emissions and reduced energy bills for occupiers.
- 7.3 These developments are benefiting from the dynamic local authority partnership which is driving forward the overall developments. East Devon District Council and Exeter City Council together have partnered the private sector to bring investment to the area. The Councils are working with companies including The Met Office, E.On, St Modwen, Exeter University, Flybe, Balfour Beatty, Redrow, Hallam Land Management, Persimmon and Taylor Wimpey.
- 7.4 It is stressed that the 'West End' is not a defined policy area but is a term that refers to the group of schemes highlighted in the chapter that provide for major strategic growth in the Western part of East Devon. The Rest of East Devon is referred to in other chapters of the Plan.

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<sup>7</sup> The Government Guidance which relates to this development can be accessed at <http://communities.gov.uk/documents/planningandbuilding/pdf/pps12lsp.pdf>

7.5 Feedback and evidence is set out below:

**What you said about major development at the West End:**

- There has been objection in the past to significant housing development in the Western part of East Devon, especially Cranbrook, but far lower levels of objection to employment generating uses.
- There have been views expressed that the major proposals in the West End should be more accessible to and do more for residents across East Devon.

**What the Sustainability Appraisal (2010) and other evidence tells us about major development at the West End:**

- Focusing large scale development in the West End would be likely to encourage investment and provide decent homes, jobs and community services. This could be at the cost of the viability of East Devon's towns and the safeguarding of the environment.
- A concentration of jobs in the West End may increase levels and distances of car based commuting.
- Additional employment land in the West End will put a strain on the natural environment but will alleviate the same pressure on more sensitive locations elsewhere in the district.
- Rather than focus on high technology industries and businesses only, which could disadvantage existing lower skilled workers, provision should be made for all types of employment to benefit a wider range of people.
- We can't know exactly about impacts of development in the West End on nearby European-protected biodiversity sites (Exe Estuary, East Devon Pebblebed Heaths and Dawlish Warren). However, the potential for significant impacts cannot be ruled out and further work is needed (Screening Report, Habitat Regulations Assessment).

- 7.6 There is limited land supply in Exeter City and for this reason as the role of the City evolves and expands development sites have to be identified in neighbouring areas. Sites in East Devon will need to provide for sub-regional development but should also serve and secure wider benefits for the whole of East Devon and its residents.
- 7.7 Strategic West End developments to the East of the M5 Motorway will be located in an area to the North of the new A30 and to the South of the Exeter to Waterloo railway line. There will also be West End development to the West of the motorway and to the North-East of Pinhoe for 800 homes.
- 7.8 East Devon's West End will accommodate a wide range of highly skilled, secure and well paid jobs. This will ensure the overall development is of sub-regional and East Devon-wide importance. Every opportunity will be taken to draw the benefits of development, skills, training and wealth created in this part of the District, through into the rest of East Devon.
- 7.9 High quality business will be attracted to this Western part of the District as a result of its proximity and ease of access to the M5 motorway and to Exeter. High quality transport links are an essential part of the appeal of this area and will be crucial to its future success. Improvement works to Junction 29 of the M5 Motorway are currently being built.

### **Consultation Local Plan – Draft Strategy 6**

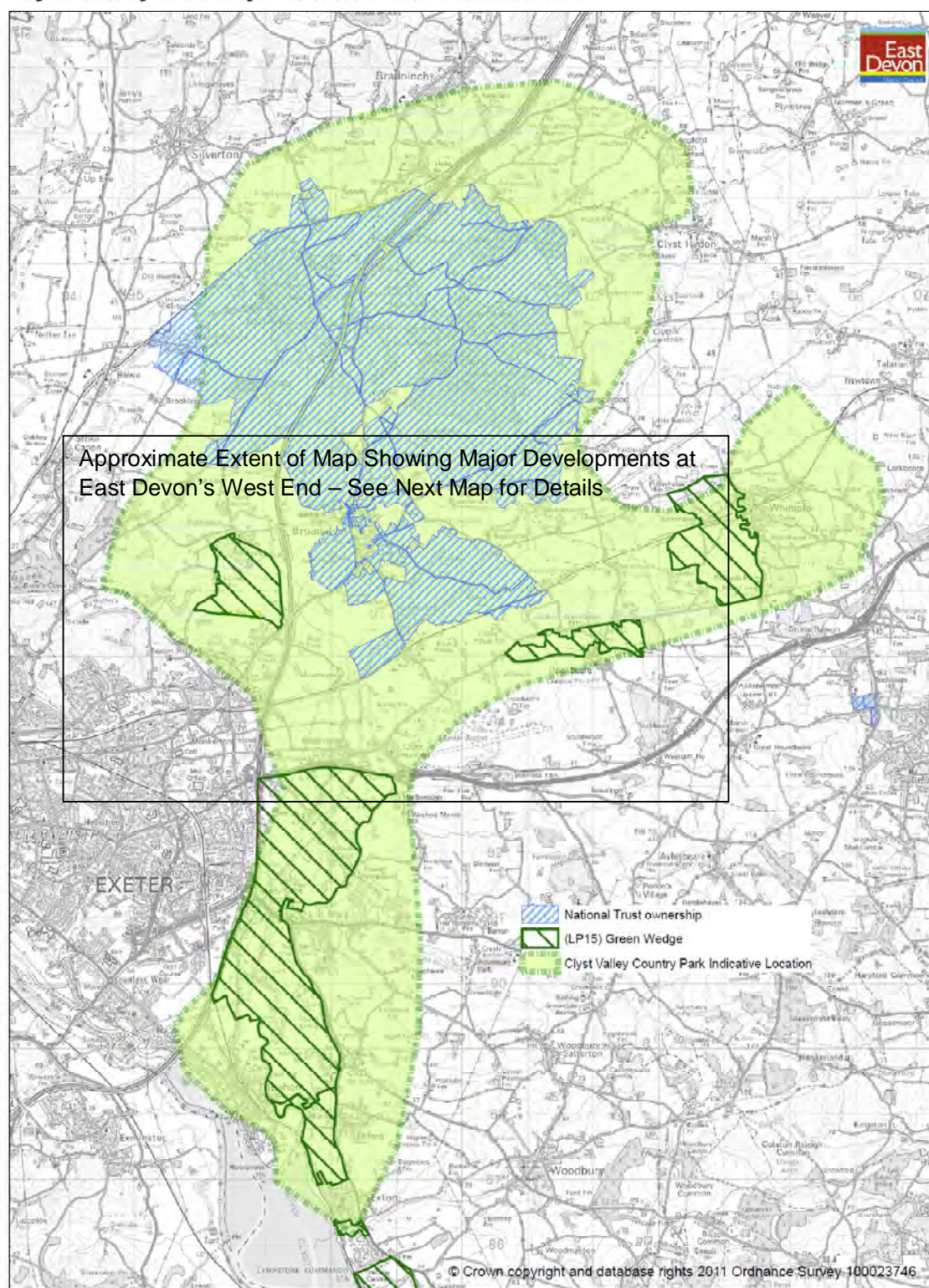
#### **Major Development at East Devon's West End:**

High quality development with associated infrastructure, built within a high quality landscape setting, will be provided in East Devon's West End. The overarching strategy for development will need to dovetail with the development strategy for Exeter. High quality public transport services with improved highway provision will be integral to the overall development. Within the West End of East Devon the following schemes will be provided:

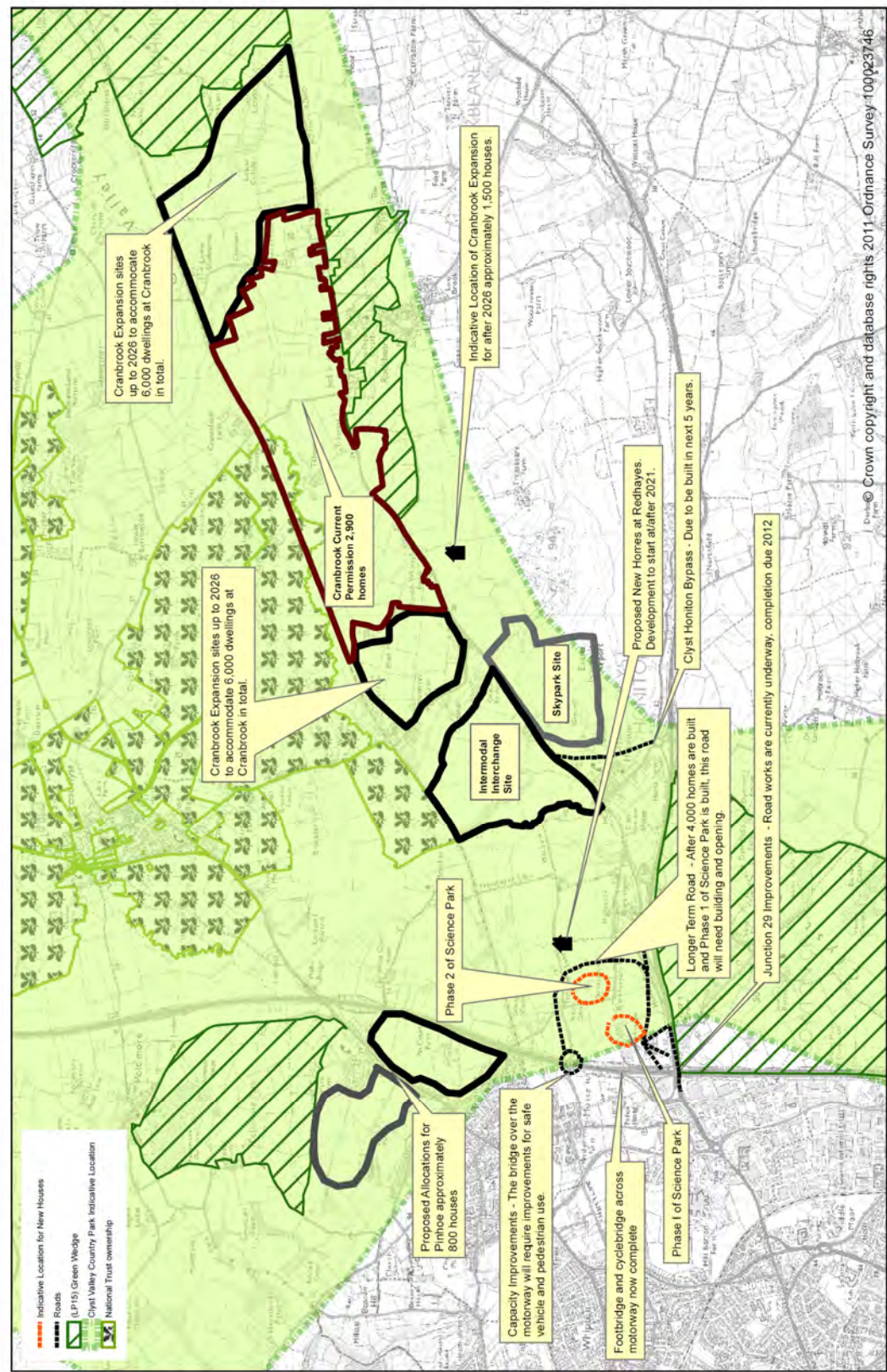
1. Cranbrook - Major new East Devon market town;
2. Pinhoe - Mixed use, residential led development;
3. North of Blackhorse/Redhayes – phased in the post 2021 stage in the plan making process - residential led;
4. Skypark - Substantial high quality business park;
5. Exeter Science Park - Research/technology employment site;
6. Exeter International Airport - Provision to be made for airport-related employment uses within operational site area.
7. Multi-modal Interchange - Facility for interchange of goods and distribution centre;
8. Exeter Airport Business Park - Middle range business park providing for medium to smaller business uses.

The major developments forming part of the development at East Devon's West End and the Clyst Vallley Regional Park proposals are identified on the following plans.

## Clyst Valley Country Park Indicative Location







Planned Proposed Major Developments at the West End - Boundaries of Development Sites are Indicative Only

## Rejected Options:

- 7.10 The Preferred Approach to development at East Devon's West End is favoured over the following alternatives:
1. **To not accommodate the schemes** – East Devon District Council has supported major development initiatives in the Western part of the District. Failure to develop would frustrate the potential to secure needed housing and high quality employment.
  2. **Concentrate all of the residential development at Cranbrook** - too much development could result in adverse landscape impacts, lead to settlement coalescence with surrounding villages, adversely impact on the operation of Exeter Airport. It is questionable whether house builders would actually build higher development levels.
  3. **Provide a second new community** - an option highlighted in the Issues and Options report was to accommodate a second new community on or adjacent to the A3052 highway in the vicinity of Westpoint. There were however, no land owner expressions of interest in a large scale (4,000 plus dwellings) new town in this area. Furthermore significant development in this area would need very expensive highway infrastructure provision to supply a new crossing of the M5 Motorway. To be viable around 10,000 dwellings or more may be needed.
  4. **Accommodate a smaller development on the A3052 Corridor** - an option might be to seek to accommodate a smaller development, perhaps around 1,000 dwellings, on or next to the A3052 corridor in the vicinity of Westpoint. This option would however, be too small to support all of its own infrastructure, including social, community facilities and schools. It would be of a size that it is believed would exceed working highway capacity levels at the roundabout at Junction 30 of the M5 Motorway.
  5. **Provide for Very Large Scale Growth at Pinhoe** - The size of an urban extension at Pinhoe is limited by the highway's capacity of the B3181 through Pinhoe. Assessment suggested that about 800 dwellings could be accommodated on the existing road network without significant works. Beyond this level very major highway works would be required.

## Green Infrastructure – A High Quality Green Framework for Development

- 7.11 Green Infrastructure comprises of open green spaces, footpaths and other links. It is a generic term for the creation of high quality, attractive and functional places that provide a setting for day-to-day living, enhance the character and diversity of the landscape, and conserve heritage assets. All of which contribute to the area's unique sense of place and cultural identity. It will enrich the area's wildlife value by addressing the negative impact of habitat loss and fragmentation by promoting habitat enhancement and linkage. Green Infrastructure will also help to connect residents and visitors to leisure and work destinations along a network of safe and clearly defined routes. Tree cover in urban settlements will make places more resilient to climate change thus keeping temperatures down<sup>8</sup>.

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<sup>8</sup> LPA's, NE and Growthpoint Strategy (2009) "Exeter Area and East Devon Green Infrastructure"  
[http://www.eastdevon.gov.uk/planning-ldf\\_greeninfrastructure](http://www.eastdevon.gov.uk/planning-ldf_greeninfrastructure)

7.12 Feedback and evidence is set out below:

**What you said about green infrastructure provision at East Devon's West End:**

- There has been broad support for high quality green infrastructure.
- More needs to be known about existing 'green features' to ensure appropriate management regimes are in place and to maximise potential of assets.
- A landmark bridge to Exeter across the M5 is important.
- We should maximise and promote opportunities for schemes to generate revenue to offset management costs, see for example the Exeter Wild City model.
- Green Infrastructure should be integrated with other policy initiatives.
- Emphasis needs to be on connecting communities together.
- We should promote collaborative working between agencies, stakeholders and landowners.
- We should consider the budgets that already help provide and maintain Green Infrastructure and focus on ensuring they are secured and the benefits explained.

**What the sustainability appraisal and other evidence tells us about green infrastructure at East Devon's West End:**

- Climate change is a significant challenge that needs to be given prominence in decision making. Innovative solutions need to be sought to ensure that other sustainability considerations (such as landscape designations do not constrain the achievement of low and zero carbon development). It is possible to achieve positive effects on what may initially appear to be conflicting sustainability objectives.
- Green Infrastructure principles should be adopted in the design, layout and siting of major growth in the West End ensuring that environmental services are retained and enhanced and that building design is sensitive and enhances local character.

7.13 Green Infrastructure is seen as an essential part of the vision for a long-term sustainable future for the Exeter and East Devon Growth Point area. Green infrastructure is also relevant to all other parts of the District and policies in the plan refer to provision. The Council and partners are all committed to developing strategic networks of accessible, multi-functional sites as well as linkages. These contribute to people's well-being in addition to sustaining an important wildlife resource.

7.14 In East Devon's West End Green Infrastructure is especially important as there will be a very significant level of development occurring with a substantial increase in the resident and employee population. Biodiversity, wildlife interests and environmental interests can be harmed by large scale development. However, if undertaken in a positive manner, in line with sound Green Infrastructure planning, adverse environmental impacts can be minimised and opportunities for habitat improvements and new provision can be generated. The net environmental benefits post development can be far greater than the green field starting position.



## **Consultation Local Plan – Draft Strategy 7**

### **Green Infrastructure in East Devon's West End:**

We will ensure that the Green Infrastructure Strategy for the East Devon's West End dovetails with comparable work being undertaken in Exeter to provide a green framework within which strategic development occurs. All of the major development proposals of the West End will individually and collectively contribute to the implementation and long-term management of green infrastructure initiatives and schemes.

### **Cyst Valley Regional Park**

We will plan for the Cyst Valley Regional Park and identify land for its provision through the Local Plan. Multi-agency funding and support will be sought to enable the provision of the park that will:

- a) provide high quality green space that is complementary to development and will be a stimulus to encourage commercial and business development of the highest standard.
- b) ensure natural ecosystems function in the West End of our District and ensure residents, workers, school children and visitors have easy access to high quality open spaces, with linked benefits to health, education and food production.
- c) take recreation pressure away from more environmentally sensitive locations thereby overcoming concerns arising from application of the Habitat Regulations that would otherwise prevent development coming forward. Provision of the park could help address need and requirements arising from development in other parts of East Devon, Exeter and potentially Teignbridge. We will encourage a park that 'reaches into' the open spaces of our neighbouring authority partners.
- d) Provide new wildlife corridors that enhance the biodiversity of the West End.
- e) Provide green corridors, open space and biodiversity enhancement areas. Enhance cycling and walking opportunities to link habitats and sustainable movement networks that promote the overall recreational experience for the West End.

The country park will be designed and managed to highest green urban design standards and it will be subject to parkland protection policies. The usual countryside policies of the plan will apply in non-allocated development locations and areas.

The Cyst Valley Regional Park proposal does not establish a 'policy boundary' that prevents or 'says no' to development. It sets out where particular emphasis will be attached to establishing high quality landscapes and settings for development, people and wildlife.

## **Rejected Options**

7.15 The Preferred Approach to Green Infrastructure Provision is favoured over the following alternatives:

1. **Not to plan for Green Infrastructure in the West End** - Green Infrastructure will help provide environmental benefits and will greatly add to people's quality of life and well being. To not plan for its provision would compromise these objectives.



2. **Not to develop a Green Infrastructure Strategy** - this could undermine the Strategic Objectives to conserve and enhance existing facilities, and to support healthy and socially inclusive communities.

## Physical Infrastructure

7.16 Having the right physical infrastructure in place is a critical requirement for any new development. The scale and nature of development proposed for East Devon's West End is such that significant attention will be attached to securing infrastructure provision.

7.17 Feedback and evidence is set out below:

### **What you said about physical infrastructure provision at East Devon's West End:**

- Consultation has shown support for securing relevant and appropriate physical infrastructure.

### **What the sustainability appraisal and other evidence tells us about physical infrastructure provision at East Devon's West End:**

- Devon County Council commissioned consultants Parsons Brinckerhoff to evaluate the transportation impacts of various housing growth alternatives on the Eastern edges of Exeter (Assessment of Options for Delivery of RSS Growth in the Exeter Sub Region, Parsons Brinckerhoff for Devon County Council, January 2010). The study advises on key infrastructure requirements that are referred to throughout this report.
- The provision of sustainable modes of transport to serve the West End could have a significant positive impact on the greenhouse gas emissions of those travelling to and from the area.

## Transport and Movement

7.18 One of the major constraints to development in the West End is the capacity of Junction 29 on the M5 Motorway. Significant road improvements are now taking place at Junction 29 that will increase vehicle capacity and provide for direct access into the Science Park. A new cycle and pedestrian bridge now spans the M5 motorway and work is well advanced on the Science Park access road that will link the A30 to the M5 Tythebarn Road Motorway Bridge and thereafter will provide links into Exeter City.

7.19 In January 2011 Devon County Council outlined its commitment to improving public transport and other forms of green travel in 'Devon Metro – fulfilling the potential of rail'<sup>9</sup>. One of the aims is to promote opportunities to enhance rail travel into Exeter to help facilitate economic growth and a reduction in carbon emissions. In the short term, service improvements could be implemented, but beyond that infrastructure improvements such as passing loops and new rolling stock would be required. Rail can offer a fast, attractive alternative to car usage especially where there is a station within walking distance from home. Economic assessment has shown that new

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<sup>9</sup> Devon County Council (2011) [www.devon.gov.uk](http://www.devon.gov.uk)

stations would be good value for money and would provide travel time benefits. The station for Cranbrook is expected to be commenced in 2012.

- 7.20 The Devon Local Transport Plan 2011-2026 includes an Implementation Plan<sup>10</sup>. Co-operation between the County Council and rail providers has led to an extra platform and passing loop at Axminster, and an hourly service to Waterloo. The Great Western Route Utilisation Strategy (produced by Railtrack) considers extending the service to Cranbrook and Axminster. The Strategy envisages lengthening trains to reduce overcrowding. In the longer term more costly options with new infrastructure would be needed: passing loops at Lympstone and Digby & Sowton would permit a 15 minute frequency on the Exmouth line and a further passing loop at Cranbrook or Whimble would permit a half hourly service to Axminster.
- 7.21 Future transportation improvements for the East Devon's West End that are currently programmed to occur include:
- Clyst Honiton By-pass.
  - Highways links into and through development sites and schemes.
  - A high quality Public Transport service through West End sites and into Exeter City Centre. In the longer term and in association with development at Ottery St Mary we would want to see this service extend into the town of Ottery St Mary.
  - New cycle and footpath links.
  - A New Railway station at Cranbrook.
- 7.22 The Science Park access road will serve as an access road for up to 4,000 residential dwellings in the West End at Cranbrook. However, in the longer term (likely to be in the run up to or after 2021 – into the final phase of the Local Plan) it is understood that it will be necessary for an additional or alternative parallel road to be provided (outside of the Science Park) to create a link from the A30 to the Tithebarn Lane Bridge. This motorway bridge will also require improvement works to allow for increased vehicle use and safe pedestrian and cycle crossing.

### **Potential for Development on the A3052 Corridor**

- 7.23 The A3052 highway runs from Junction 30 of the M5 motorway Eastward into East Devon. Adjacent to this road, on the Western side of East Devon, there are a number of employment sites, housing areas and also Crealy Adventure Park. Recent planning permissions granted at Greendale and Hill Barton business parks will help create new jobs for this part of the District.
- 7.24 We have looked at potential for further growth on this corridor, including the possibility of a second new town for up to 4,000 dwellings and also a smaller scale housing scheme of up to 1,000 dwellings. Development would however, require very significant infrastructure improvements to address resulting congestion. New access roads,

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<sup>10</sup> Devon County Council (2011) "Local Transport Plan- Devon and Torbay Strategy 2011-2026"  
<http://www.devon.gov.uk/dtltlp2011-2026strategydoc.pdf>

distributor roads and bridges over the M5 could be required. Public transport access would need to be enhanced. All of these would be expensive. For these reasons and other broader impacts a second new community option is not considered to be desirable. We are not proposing any significant new additional development on this corridor although we will keep land supply and demand issues under consideration and will review provision in the years to come.

## Additional Infrastructure at the West End

- 7.25 In addition to road provision the West End will require a full range of infrastructure services. Current proposals include development of a combined heat and power station with longer term ability to run on bio-fuels. This will serve Cranbrook, Skypark and other major schemes in East Devon's West End. A new reed bed based sewage treatment plant is also proposed. A key element of attracting high technology development and research establishments will be including the very best information technology connections. The Exeter Science Park will have world class ICT infrastructure.

### Consultation Local Plan – Draft Strategy 8

#### Integrated Transport Provision and Infrastructure Provision at East Devon's West End:

We will promote high quality, affordable and integrated transport provision at East Devon's West End where, working with partner organisations, we will secure a provision based on a hierarchy of;

1. Walking
2. Cycling
3. Frequent and high quality Public Transport provision (given priority over other road users)
4. Private motor vehicles.

Coordinated infrastructure provision will be required to cover:

1. Low carbon heat and power supply;
2. Waste disposal;
3. Highest quality data service infrastructure provision, especially broadband connections;
4. Health and education provision.

Funding contributions will be sought from all developments in the West End to secure implementation of integrated transport and infrastructure provision.

## Rejected Options

- 7.26 The Approach to infrastructure provision is favoured over the following alternatives:
1. **Make no new transport provision** - the existing highway network is near capacity and without substantial improvement the major development proposals could not go ahead.
  2. **Provide for or place the onus on car and motor vehicle use** - whilst many people will want to drive, motor vehicles use available road space and land in a

less efficient manner than public transport and they also emit higher carbon dioxide levels per passenger mile. Public transport is also available to non-car owners or users. There are therefore strong environmental and social reasons for promoting high quality public transport as well as health, environmental, social and cost benefits to encouraging walking and cycling.

3. **To not promote integrated transport provision** - public transport services are more attractive to users when they integrate with one another, for example bus timetables co-ordinating with train timetables.
4. **To not promote high quality public transport** - public transport is far more appealing to users when it is high quality, frequent, affordable, quicker and easier to use than private vehicles. It would not be desirable to promote a service not aiming to meet these ends.
5. **To not promote 'green' energy solutions** - we could choose not to seek green energy provision to serve developments but this would fail to address the climate change agenda. Also combined heat and power provision is the most cost effective means to secure the highest eco-rating for new developments.

## Expansion of Cranbrook

7.27 This section sets out details of development and expansion of the new market town of Cranbrook, which will be a major new market town for East Devon.

7.28 Evidence and feedback is set out below:

### What you said about Cranbrook Expansion:

- The Issues and Options report did not show a clear consensus on favoured areas for expansion of Cranbrook. Development to the West received more support than other alternatives and development to the South West (South of the old A30) and North East (North of the railway) also received high levels of support.
- Concern has been expressed that development South of the A30 (especially to the South-West) could cause neighbourhood conflict with noise generation from Exeter Airport.
- Concern has been expressed in respect of coalescence of Cranbrook with other settlements (especially Broadclyst, Whimble and Rockbeare).

### What the sustainability appraisal and other evidence tells us about Cranbrook expansion:

- The Strategic Housing Land Availability Study received expressions of interest for Cranbrook expansion for land to the East and West of the existing site and South and South West.
- Growth at Cranbrook (in addition to that already planned) could be damaging to the environment on some fronts, but would generally be beneficial to the economic and social well-being of the West End of the District (Sustainability Appraisal 2010).

7.29 Cranbrook has permission for development of 2,900 dwellings and development work started in summer 2011 on the new community.

- 7.30 Cranbrook will continue to expand and develop into an important service centre. The town will not only be home to around 15,000 or more East Devon residents but it will also provide jobs, recreation, community and education facilities to these residents and to surrounding communities. Cranbrook will therefore, be a self contained town serving its surrounding area.
- 7.31 The development of Cranbrook will be accommodated in a high quality landscape setting with local play areas and green spaces within easy access of all homes. An extensive Country Park (linking into the proposed Clyst Valley Regional Park) will form part of the scheme and sports pitches and informal recreation spaces will also add to the open spacious quality of the settlement. The town will sit comfortably in its wider landscape setting and a Green Infrastructure Strategy will plan for multi-functional high quality, open spaces or nature conservation value.
- 7.32 The town will be served by high quality public transport that will also link up other residential neighbourhoods, social and community facilities, mixed used development areas and employment areas both in East Devon and Exeter.
- 7.33 Identified areas of expansion for Cranbrook are to its East and West and beyond 2026 by indicative notation to the South West. Allocated sites, up to 2026, will have minimal encroachment toward Exeter Airport, will not lead to settlement coalescence with Broadclyst, Whimble and Rockbeare and will not result in severance of Cranbrook by either the railway or the old A30. Sites for expansion are being promoted by landowners and they are available for development. At net densities in the 30 to 50 dwellings per Hectare range the allocated land at Cranbrook will accommodate around 6,000 new homes. This level of provision will still allow for extensive open spaces as part of the overall gross development area. Densities will typically be higher in town centre areas and lower in peripheral areas. High quality urban design standards will be critical for Cranbrook and other West End developments.

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### Development at Cranbrook:

Cranbrook will be developed as a modern market town to eco-town standards. Mixed use development, to provide housing, (including affordable) social and community facilities, recreation and education facilities and jobs will occur on a phased basis. The town will be built to distinctive high quality design standards incorporating the best in environmentally friendly technology. Open spaces and facilities will be readily accessible to all residents with an onus on pedestrian and cycling access and high quality public transport.

### Working with our partners we will promote Cranbrook, over the 2006 to 2026 period, to accommodate:

1. **New Homes** - 6,000 new homes - which will be required to be of the highest standards in terms of energy efficiency, quality of design and access to services and facilities. At peak build rates up to or over 500 new homes a year could be built at Cranbrook.
2. **Jobs** - provision of 14 hectares of employment land to accommodate a range of employment opportunities for residents of Cranbrook and surrounding areas. Nearby West End employment sites will also provide jobs for Cranbrook residents and some will travel to other locations for work purposes including Exeter City.
3. **Town Centre** - The town centre of Cranbrook will provide a focal point for retail provision and this will be complemented by a series of smaller neighbourhood centres.
4. **Social and Community Facilities** - Cranbrook will accommodate a full range of social and community facilities to meet the needs of all age groups that will live at the new town.
5. **Infrastructure** - will be provided to serve the new town to include a combined heat and power station.

It is proposed that land is allocated for the expansion of Cranbrook to the East and West (North of the old A30 and South of the Exeter to Waterloo railway line) of the existing planning application boundary as shown on Map 3. In the longer term and beyond 2026 (and expected to be in the 2026 to 2031 period) Cranbrook is envisaged to develop in a South Westerly direction (South of the A30) with provision for a further 1,500 homes. Proposals for the development of Cranbrook will need to take into account this longer term development aspiration.

Planning permission for individual schemes will not be granted unless they are compatible with a programme of works that will achieve the delivery of a co-ordinated package of integrated development in the West End. Delivery will be secured through legal agreements which secure appropriate financial contributions and land to ensure the timely implementation of the appropriate infrastructure projects

7.34 **Rejected Options:** The Preferred Approach to Cranbrook development is favoured over the following alternatives:

1. **To not expand Cranbrook** – failure to expand Cranbrook would mean the Local Plan is not compatible with past strategic policy and it is not deemed a credible

option. Furthermore, failure to expand Cranbrook would mean that economies of scale would not be realised and needed housing not secured.

2. **To not provide a mixed range of uses** – it might be possible to plan for housing only but to do so would result in a development in the countryside without supporting facilities and infrastructure. Residents might end up being car dependent to access services.
3. **To develop North of the railway line** – land owners and developers have not expressed an interest for development North of the railway. Furthermore much of the land North of the railway is in National Trust ownership and in a floodplain and a new crossing of the railway would be very expensive. For these reasons development North of the railway is not deemed to be a credible option at this stage.
4. **In the plan period to develop South of the old A30/closer to Exeter Airport** - whilst this option could provide new housing relatively close to Cranbrook's town centre, it would result in severance by the old A30 and might give rise to conflict with the airport activities through the potential of noise impacts on the residents. In the longer term (beyond 2026) this option is deemed to be the best available choice for Cranbrook expansion though any development will need to take fully in to account and be justified in the context of the constraints highlighted.

## Land North of Blackhorse/Redhayes

7.35 The Local Plan Proposes residential and mixed use development at Blackhorse.

7.36 Evidence and feedback is set out below:

### **What you said about development North of Blackhorse/Redhayes:**

- In the Issues and Options Consultation relating to Blackhorse the majority of respondents did not favour major development.

### **What the sustainability appraisal and other evidence tells us about development North of Blackhorse:**

- A review of potential development sites indicates that there are few options (other than Cranbrook expansion) that could accommodate major development in the West End. North of Blackhorse is deemed to be the only relatively easy-to-develop and available substantial site.
- The Sustainability Appraisal made no comments specifically relating to the development of land North of Blackhorse but further homes within the general area would be likely to be accessible to community facilities and jobs.

7.37 With development starting at Cranbrook and additional land having been permitted and allocated adjoining Exeter's boundary at Pinhoe, house building at the West End is under way for the first time, after a considerable delay whilst major infrastructure funding was secured. In the early part of the Plan period therefore some 4,800 homes are anticipated to be built in this area – a build rate of 480 units per year.

7.38 In order to supplement the Cranbrook extensions post 2021, which will add another 2,500 homes, it is proposed to bring forward the land North of Blackhorse/Redhayes



just to the East of the Science Park site. This new housing provision will be on a good quality public transport route, giving easy access to the nearby employment sites.

- 7.39 A neighbourhood centre will need to form a central part of the development. This will be required to be served by very good public transport and will accommodate a full range of community facilities and commercial uses.
- 7.40 Development North of Blackhorse/Redhayes will be able to make use of already planned infrastructure and new homes will be close to employment sites and other facilities. As longer term planned development it will be able to take location advantages of infrastructure proposed in the earlier phases of plan work – including new public transport provision and jobs and other infrastructure at the Science Park.
- 7.41 Cranbrook, Skypark and the Intermodal Freight Terminal sites are to be connected to the main Trunk road network by the Clyst Honiton Bypass (planned as Access Strategy 1) and improvements to Junction 29 on the M5 (Access Strategy 2). Post 4,000 homes East of the M5, it will be necessary to provide for Access Strategy 3 – an alternative route into Exeter avoiding Junction 29. This route will pass immediately to the east of Science Park and enter the City via Tithebarn Bridge. However, should Science Park Phase Two commence before 4,000 homes are completed, this will also trigger the need for the new road to be built. The indicative route for this new road has been shown on the Map for the West End.

### **Consultation Local Plan – Draft Strategy 10**

#### **Major Development of Land North of Blackhorse/Redhayes:**

Additional housing land will be released for house building in the last Phase of the Plan ie post 2021 or once 4,000 homes have commenced east of the M5, whichever is the sooner. This will comprise sufficient land to accommodate some 600 homes which will be designed to form a village type community, with housing, including affordable homes, social and community facilities, recreation and educational facilities and be linked by pedestrian and cycle routes to the jobs available in Science Park and Skypark.

The scheme, which will be the subject of a master planning exercise, will be built to reflect an agreed distinctive architectural character and will be low or carbon zero development with onsite and/or community power generation. The development will also be designed to ensure high quality links for walking and cycling to other nearby employment sites and into the City.

#### **Working with our partners we will promote land North of Blackhorse, in the 2021 to 2026 phase of the Plan to accommodate:**

1. **New Homes** - 600 new homes will be provided in the 2021 to 2026 period - New housing development will be required to be high quality with good access to services and facilities. Some of the homes should be designed to appeal to and potentially restricted to occupancy by workers at the Science Park.
2. **Neighbourhood Centre** - A new neighbourhood centre will provide a focal point for services and community facilities.



3. **Social and Community Facilities** - A full range of social and community facilities will be needed to meet the needs of all age groups that will live North of Blackhorse and in the existing nearby communities.
4. **Infrastructure** - will be provided to include a heat and energy network to achieve low and zero carbon development.

### Rejected Options

7.42 The preferred approach to development North of Blackhorse is favoured over the following alternatives:

1. **To not develop land North of Blackhorse** - Land North of Blackhorse is a credible option for accommodating residential development in East Devon's West End. To not develop this land would prejudice the potential to provide significant longer-term housing growth.

### Land at Pinhoe

7.43 The Local Plan proposes residential and mixed use development on land North of Pinhoe. This development will form an urban extension to Exeter.

7.44 Evidence and feedback is set out below:

#### **What you said about potential for an Urban Extension at Pinhoe:**

- We have received some, but not over-whelming, objection to an urban extension at Pinhoe. The Issues and Options consultation did not indicate any clear preferences for site options.

#### **What the Sustainability Appraisal and other evidence tells us:**

- The Sustainability Appraisal flagged potential problems with development North of Pinhoe on a number of environmental and community facility fronts.
- We understand that the existing roads through Pinhoe may be able to accommodate the traffic generated from up to 800 new homes and some traffic generated from other uses.

7.45 Land North of Pinhoe has capacity to accommodate around 800 dwellings (and a resolution to grant permission exists for 450 dwellings). This capacity constraint is determined by highway limitations. The new housing provision will need to secure provision of high quality public transport and as part of the mixed use development provision will be made for 3 hectares of employment land. A new “park and ride” service will form part of the overall development.

7.46 A neighbourhood centre will need to form a central part of the Pinhoe development. This will need easy access to public transport and will accommodate a full range of community facilities. An early start of development is envisaged at Pinhoe.

7.47 The development at Pinhoe will provide for the speedy provision of much needed housing, including affordable housing, in this Western part of East Devon. Infrastructure requirements are relatively low for the proposed scheme and

development will help secure a new “park and ride” facility on the North-Eastern edge of the city for passengers travelling inward to Exeter.

### **Consultation Local Plan – Draft Strategy 11**

#### **Development of an Urban Extension at Pinhoe:**

Land at Pinhoe will be developed as a high quality mixed use urban extension to Exeter. The development will provide housing and affordable housing, social and community facilities, recreation and education facilities and new job provision. The proposals will be built to distinctive high quality design standards incorporating the best in environmentally friendly technology including the reduction of carbon emissions through measures such as micro-generated technology and decentralised energy systems. Open spaces and facilities will be readily accessible to all residents with an onus on pedestrian and cycling access and high quality public transport.

#### **Working with our partners we will promote North of Pinhoe, over the 2006 to 2026 period, to accommodate:**

1. **New Homes** - 800 new homes - New housing development will be required to be of the highest standards in terms of energy efficiency, quality of design and access to services and facilities.
2. **Jobs** - provision of 3 hectares of employment land to accommodate a range of employment opportunities for residents.
3. **Neighbourhood Centre** - A neighbourhood centre will provide a focal point for services and community facilities.
4. **Social and Community Facilities** - a full range of social and community facilities to meet the needs of all age groups that will live North of Blackhorse.
5. **Infrastructure** - will be provided to include a park and ride facility.

In addition to the land that currently has a resolution to grant planning permission for 450 homes an additional site for 350 homes will be accommodated at Pinn Court Farm on land that abuts the M5 motorway.

### **Rejected Options**

7.48 The preferred approach to development at Pinhoe is favoured over the following alternatives:

1. **No development at Pinhoe** - there is a need for housing in the West End of East Devon and Pinhoe has the attraction of being a relatively easy location to accommodate a larger number of new homes. Development is seen as appropriate.
2. **Substantial Development at Pinhoe** - The ability to accommodate development at Pinhoe is constrained by highway capacity. If more than around 800 new homes are built it would require very substantial highway infrastructure to be built. This might only be financially viable if a very big scheme was proposed.

## **Intermodal Interchange Facility**

- 7.49 The East Devon Local Plan includes policy for the development of an Intermodal interchange. This proposal will ultimately allow for a major siding or railhead on the Exeter to Waterloo railway line that will accommodate the transfer of goods from the railway to road vehicles and road to railway. There will also be open space and buildings for the storage of goods awaiting transfer and some scope for road vehicle to road vehicle transfer. The unusual and substantial nature of this scheme and the fact that it is transport related and provides low job numbers per hectare of development is such that we do not count the land take of this scheme in employment land assessments.

### **Consultation Local Plan – Draft Strategy 12**

#### **Intermodal Interchange:**

Land is allocated on the Proposals Map for an Intermodal Interchange Facility alongside the Exeter-Waterloo Railway Line.

## **Exeter Science Park**

- 7.50 Exeter Science Park will develop as a premier research and technological employment centre. The University of Exeter and the Met Office are world class institutions of acknowledged excellence and have developed a national reputation for high quality research in climate change, medical and technological fields. This expertise has already been a major boost to the economy of the City and surrounding areas and to the job prospects of local people. To help capitalise on and add to the quality of jobs and business opportunities proposals have been developed over the last decade for a major new Science Park in East Devon to the North East of Junction 29 of the M5 motorway.
- 7.51 The Council has already produced a Supplementary Planning Document for the Science Park. There is a Master Plan for the development and outline planning permission has been granted for 76,450 square metres of floor space for high technology business uses and a 150 bed hotel and conference facility and ancillary uses. Associated infrastructure, including new highway access, will also be provided.
- 7.52 This significant investment will lead to the creation of a high value employment site offering high skill and wage jobs for the local economy. It will further help position the Exeter sub-region as a leading business centre with specialist scientific and technological activities which have a national and international standing.
- 7.53 The existing permission will allow for the development of the Science Park. We consider that the Science Park allocation is appropriate to meet current and longer term needs and we are not proposing to extend it.

## **Exeter International Airport**

7.54 Exeter International Airport is one of the UK's major airports serving a wide range of passenger destinations, offering freight services and offering aeroplane servicing used by a number of carriers. The airport occupies around 140 hectares of land close to Junction 29 of the M5 Motorway and adjacent to the A30 dual carriageway.

7.55 Evidence and feedback is set out below:

### **What you said about development at Exeter Airport:**

- There has generally been support for expansion and growth at Exeter Airport in recent years (although the Planning Policy Team at East Devon District Council have not asked specific questions on development at the airport in general).

### **What the sustainability appraisal and other evidence tells us about development at Exeter Airport:**

- The Issues and Options report did not include specific proposals for the development of the airport so the Sustainability Appraisal has no comment on this.
- We know that the airport operators would like to see more business and passengers at the airport.

7.56 Development directly related to Airport operations, such as new hangers or terminal facilities, so long as the fall in airport operational land do not typically require planning permission (they are deemed as 'Permitted Development'). Likewise increasing passenger numbers is typically not an issue requiring planning permission. Growth of operational activity and passenger numbers is supported by the Council.

7.57 Future activity at Exeter airport will:

- Support the UK economy.
- Support regional economic growth.
- Allow for tourism growth in the South West region.
- Generate substantial private sector investment.
- Directly and indirectly generate new jobs (The airport site had 1,400 full time employees in 2007 the earnings of whom were on average 33% higher than the local average).

### **Consultation Local Plan – Draft Strategy 13**

#### **Future Development of Exeter International Airport:**

The Local Plan will recognise the importance of airport expansion and seek to encourage supporting infrastructure to provide for its direct airport related growth and expansion. It is recognised that many operational uses do not require planning permission and these developments, where compatible with safe and efficient airport operation and where they do not have adverse impacts where on land within operational boundaries, will be supported.

- 7.58 The preferred approach to expansion of Exeter International Airport is favoured over the following alternatives:
1. **To not allow for airport expansion** - failure to support airport expansion could undermine economic benefits the airport offers to the local and regional economy.
  2. **To allow for significant unconstrained/unregulated expansion** - this approach would run counter to the objective of managing the overall scales and levels of development in East Devon's West End with potentially adverse environmental impacts. It may also fail to direct new development to the most relevant locations and not help open up key strategic investment sites.

### **Exeter Airport Business Park**

- 7.59 Exeter Airport Business Park lies to the South of the Exeter International Airport. The Business Park is home to a range of successful businesses and building and plot vacancy levels at the park are very low. Exeter Airport Business Park accommodates some smaller sized high technology businesses but for the most part is home to manufacturing and distribution businesses and to this end it is not in direct competition with the 'upper end' jobs that Skypark and the Science Park will be seeking to attract.
- 7.60 Evidence and feedback is set out below:

#### **What you said about expansion of Exeter Airport Business Park:**

- In the Issues and Options report we asked about business expansion options in the West End. Expansion of the Exeter Airport Business Park received marginally more support than alternatives.

#### **What the sustainability appraisal and other evidence tells us:**

- The sustainability appraisal noted that the Business Park is remote from centres of population and so less accessible to pedestrians.

- 7.61 Although the thrust of employment creation in East Devon's West End will be on the major new employment parks and the high value jobs they will offer it is recognised that it is important to also provide a range of additional employment opportunities. Exeter Airport Business Park has proven to be a very successful business location in recent years. Proximity to the M5 Motorway and the A30 being key to its success.
- 7.62 In order to provide for a range of business uses, not just high skill/high technology uses, in the West End it is proposed that a modest provision is made for expansion of the Airport Business Park.
- 7.63 Adjoining the current Business Park outline planning permission has been granted for an airline training academy comprising classrooms and ancillary office space with linked simulator building and ancillary workshops for the training of cabin crew, pilots, technical and customer care staff. This is to be constructed in two phases (Phase 1 - 5,600 sqm; Phase 2 - 13,500 sqm) together with up to 160 bedroom hotel (7,600 sqm), combined heat and power plant, access roads, car parking and landscaping. Development is expected to start in the near future.

**Consultation Local Plan – Draft Strategy 14**  
**Future Development of Exeter Airport Business Park:**

To enable modest expansion of the Exeter Airport Business Park 5 hectares of additional land (over and above the Training Academy and hotel sites) will be allocated or identified for business/employment generating uses through future stages of plan making.

**Rejected Options:**

- 7.64 The preferred approach to expansion of Exeter Airport Business Park is favoured over the following alternatives:
1. **To not expand the airport business park** - this would fail to capitalise on a successful business location.
  2. **To Provide a More Substantial Area For Expansion** - this could undermine the overall strategy of securing investment at the strategic employment sites.

**Skypark Business Park**

- 7.65 Skypark will develop as a major high quality business park and we are proposing its managed expansion.

- 7.66 Evidence and feedback is set out below:

**What you said about expansion of the Skypark Business Park:**

- Through the Issues and Options consultation there were higher levels of support for expansion of Skypark.

**What the sustainability appraisal and other evidence tells us about Skypark Business Park:**

- The Sustainability Appraisal noted benefits in economic and social terms (jobs, training and transport) but at a cost to the environment.
- Skypark Business Park is being promoted for high skill and high wage jobs and should attract inward investment from major businesses. Once started further and ongoing expansion will help secure increasing job numbers.

- 7.67 Outline planning permission has been granted for the 40 hectare Skypark Business Park. It will accommodate high quality business uses and complementary uses to include crèches, cafes and shops as well as 150 bed hotel with associated leisure and conferencing facilities. There are significant economic benefits associated with the current Skypark proposals including:
- 7,600 jobs once completed (3,800 by 2015).
  - Contribution of £7 million gross value added to the regional economy by 2015.
  - Contribution of £10 million of investment for infrastructure work.

- 7.68 The Skypark business park was granted planning permission in June 2010. It will use innovative and sustainable design techniques and it will be locally distinctive,

sustainable and flexible in design. It will provide a range of high quality open spaces and street types and buildings will be built to BREEAM 'Very Good Standard' as a minimum. There is a commitment is made to producing a minimum of 10% of the development's energy from renewable sources and there will be a public transport route through the site.

- 7.69 In future reviews of the Local Plan assessment will be undertaken of the need and appropriateness to extend the Science Park. In this plan however, expansion is not promoted. The onus is placed on securing development of the existing land provision without further expansion before the first development has started.

#### **How we reached these Policy Positions**

The Council and partners have had a long term policy of accommodating strategic development in the West End of East Devon. There have been objections to the scale of proposed development but the strategy is regarded as remaining sound. We have though reduced overall housing numbers and employment allocation for the West End with an emphasis on promoting delivery of the Cranbrook New Community and the key strategic employment sites of Skypark and the Science Park.

**TO MAKE COMMENTS ON CHAPTER 7:  
DEVELOPMENT OF EAST DEVON'S WEST END  
visit:  
[www.eastdevon.gov.uk/draftlocalplan7](http://www.eastdevon.gov.uk/draftlocalplan7)**





## 8. Axminster

### The Future for Axminster

8.1 Our summary vision and strategy for Axminster is one of:

Larger scale housing growth to promote and be a catalyst for further commercial activity. A focus will be placed on town centre regeneration with recognition of need for measures to address adverse traffic impacts and also to conserve and enhance the fine built heritage of the town and surrounding countryside<sup>11</sup>. We already have plans in place for provision of residential, commercial and recreational provision to the North of Cloakham Lawns.

We will also plan for major mixed use strategic development to the East of the town for up to, and in the longer term potential for more than, 650 new homes to help provide a North-South relief road for the town, but to also increase the critical mass of residents in the town to support the future vitality of Axminster.

8.2 Feedback and evidence is set out below:

#### **What you said about the future of Axminster:**

- There is general support through the Issues and Options process for controlled growth in Axminster. People prefer energy efficient housing on brownfield land where possible together with road infrastructure improvement.
- Housing is wanted for singles, families, disabled and elderly people. Warden-controlled, lifetime, self-build and most importantly affordable homes are required.
- Axminster people want school, health, community and recreational facilities for all age groups to match housing and to be made more easily accessible.
- The consensus view is that big employers (Axminster Power Tools and Axminster Carpets) need to be retained, and more jobs created to keep young people in the town.
- People like the good range of independent shops in the town but a Job Centre and hotel should be added. Food tourism is an opportunity.
- A need for more open spaces and recreation areas was voiced by many, with better access to, and use of, the river and surrounding countryside.
- Flooding seems to be worsening. Surface and foul drainage systems need upgrading.
- Discussions around a North - South relief road were very prominent. Lorry traffic and cars from additional housing were two main themes.
- Public transport by train is good but passengers want improvements to bus routes and timetables into and around the town, especially later for young people.
- Connection to the Sustrans cycle route is a very popular idea.
- There is universal support for broadband improvements for homes and businesses.
- The idea of green energy generation, using photo-voltaics and solar thermal means, was broadly supported. There was less enthusiasm about wind turbines.
- A community Plan for Axminster that was subject to extensive consultation promotes provision for a relief road for the town.<sup>12</sup>

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<sup>11</sup> Axminster Town Council (2009) "A Vision of Axminster- Axminster Community Plan"

<sup>12</sup> EDDC (2009) "Axminster Evaluation of Potential Strategic Allocations"

**What the sustainability appraisal and evidence tells us about the future of Axminster:**

- Axminster may be the best place in the East of the district for larger scale housing growth if jobs and services are also provided. This would reduce commuting to employment centres in the West End and Exeter (Sustainability Appraisal 2010).
- Strict environmental controls should prevent development from damaging the adjoining AONB or from worsening the likelihood of flooding (Sustainability Appraisal 2010).
- A North – South relief road could bring social, economic and environmental benefits to the town centre but would probably increase traffic overall. It would move congestion problems to other parts of the town and damage the landscape and ecological value of the wider area. Instead road and public space improvements, and circulation controls, should minimise local traffic levels, improve through traffic flow and enhance townscape and safety in the town centre (SA 2010). Notwithstanding these comments a North-South relief road is proposed and measures will need to be taken to minimise adverse impacts.
- Any greenfield development around the town would be likely to have poor impacts on community and environmental grounds with land to the North (Cloakham Lawns) faring particularly badly. (SA 2010).
- Redevelopment of brownfield land within the town would be beneficial, although change within the historic town centre should respect its heritage. (SA 2010).
- Development on all sites around and within the town would be likely to have significant effects on the internationally-designated wildlife and habitat sites (River Axe SAC, Sidmouth to West Bay SAC) and would therefore need to undergo an Appropriate Assessment. Sites could only be promoted with appropriate avoidance or mitigation measures, to ensure no adverse impacts would arise. (Screening Report, Habitat Regulations Assessment 2010).
- The March 2011 East Devon Strategic Housing Land Availability Assessment indicates that there is a potential supply of 'developable' land in the Parish of Axminster to accommodate around 1810 homes up to 2025, in addition to those with planning permission yet to be built.

**Axminster Now**

- 8.3 Axminster Parish's population in 2001 stood at 5,626 with 2,748 dwellings falling inside the existing Local Plan Built-up Area Boundary . There was moderate growth in the town (around 36 dwellings being built per year between 1995 and 2010, although for 2004/5 and 2005/6 there were around 100 dwellings completed per year). The Local Plan strategic policy approach implies a substantive increase in annual house building levels.
- 8.4 The town is one of the key manufacturing employment centres of East Devon, with some 75,000 sq m of employment floorspace, which accounts for about 12.5% of all of the district's employment floorspace<sup>13</sup> Most of this is made up of factories, with some offices and warehousing. The 2001 Census showed little unemployment. Very few people travelled to work by public transport most going by private vehicle. Although more than 1/3 worked from home or travelled by other means.

<sup>13</sup> See Atkins (2006) "East Devon Employment Land Review 2006-2026" for fuller details.

- 8.5 The recently updated retail study for East Devon<sup>14</sup> finds Axminster to have a reasonably healthy town centre with low vacancy rates. There are good levels of food retention shopping but only 18% of non food expenditure is retained in the town. There is no capacity for additional food retail floorspace but there is capacity for additional non-food floorspace. This will be encouraged.
- 8.6 Axminster lies roughly equi-distant (30 - 40km / 12 to 20 miles) from the major centers of Exeter, Taunton, Yeovil and Dorchester, is served by the Waterloo to Exeter main rail line, and has reasonable road links to other towns and its hinterland. At peak times trains operate an hourly service to Exeter, however proposed changes will provide for more frequent, half hourly, services. The town functions as a modest-sized employment and service centre. Proposed growth will however, elevate its status to a more significant service, employment and residential centre. The town centre has a reasonable range of mainly independent shops with few national retailers, although food shopping is dominated by the edge of town centre Tesco.
- 8.7 Axminster hospital serves the town and surrounding area and the town has both primary and secondary school provision. Community, leisure and recreational provision includes indoor and outdoor sports facilities, a youth centre and a Town Hall.
- 8.8 Land to the North, South and West of the town is designated AONB, and the River Axe, running along the Western side of the settlement. This has national (SSSI) and European (SAC) wildlife and habitat protection. Land to the West of the railway line is vulnerable to flooding (zones 2 and 3).

### **Axminster: The Future**

- 8.9 We will promote Axminster as a self-contained and increasingly significant and important East Devon town by:
- Safeguarding existing employment land and allocations and identifying further land, to ensure the supply of a wide range of premises, including starter and next-phase units.
  - Promoting the regeneration and physical enhancement of sites within the town centre, to improve traffic management and non-car accessibility, support commercial viability and promote civic pride.
  - Provide for significant new residential development with associated infrastructure, including a North-South relief road.
  - Requiring that housing development is matched by new employment opportunities as well as social and community facilities.
  - Supporting the retention and improvement of existing community services.
  - Actively plan for, in association with substantial mixed use development, a North-South relief road for the town, although this will only be acceptable when improved transport facilities (provision of half hour train services) are available to Cranbrook and Exeter stations. Such transport provision will serve the major employment centres of East Devon's West End and Exeter.

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<sup>14</sup> GVA (2011) "East Devon Retail Study – Update 2011"

- Promote and encourage improvements to foul and surface water drainage in the town.
- Address the Town Centre congestion issue by securing transport infrastructure that reduces private car use, accommodates more efficiently that vehicular traffic which is necessary for the town's continued economic and social function, and maximises accessibility within and to the town. Such measures will achieve the objective of the called-for by-pass without damaging the environment around the town, and within the financial constraints currently forecast.
- Promote long-term and wide-scale conservation and enhancement of the environment by ensuring efficient energy consumption and generation, waste minimisation and re-use, and improved utilities, including communications, provision for all new developments.
- Secure the conservation of the exceptional natural setting of Axminster AONB and national and international wildlife habitat designations by requiring new green infrastructure to link with and complement the existing landscape to be embedded in large scale developments from the start.
- Expect 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.

#### **Consultation Local Plan – Draft Strategy 15 Development at Axminster:**

In Axminster we will support and reinforce the town's role as a self-contained medium-sized town, serving the employment, commercial and community service needs of the settlement and its rural surroundings.

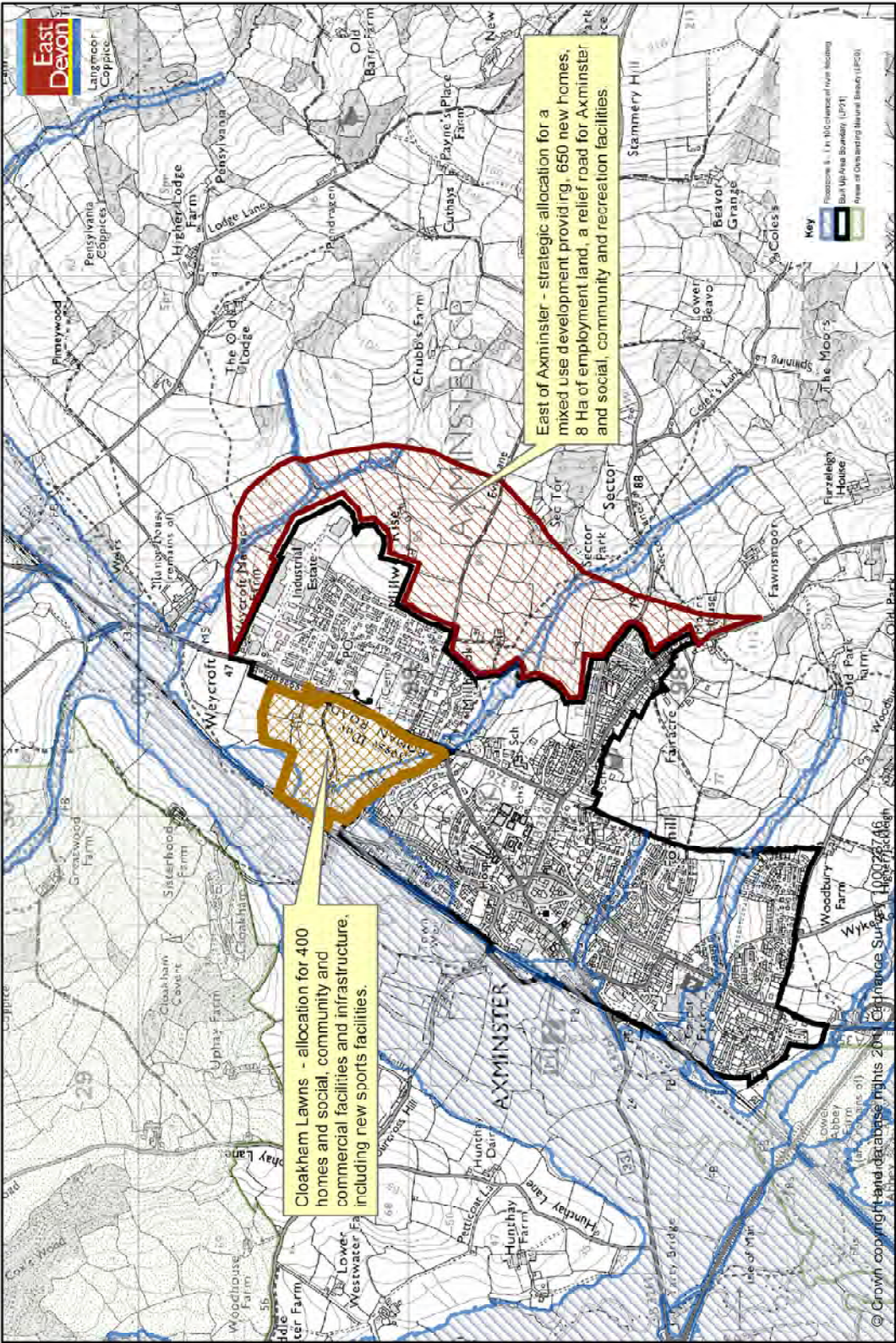
Over the 2011 to 2026 period, we will promote and plan for:

- **New homes** - encourage the build-out of existing commitments and allocate a strategic site at Cloakham Lawns for up to 400 houses. Make a strategic allocation of land for around 650 homes to the North and West of the town to accommodate a mix of uses with a North South relief road for the town. This will be subject to improved public transport including provision of a half hourly train service to Exeter and Cranbrook.
- **Jobs** - allocate 8 hectares of employment land including the existing 4.5 hectare Local Plan allocated extension to Millwey Rise industrial estate and it may be that this 4.5 hectare element should be on a different part of the overall employment provision.
- **Town Centre** - promote the regeneration of the Webster Garage site and adjoining land to support commercial activity, enhance the public realm and address traffic congestion issues.
- **Transport** - support the provision of better sustainable (non-car) transportation, including footpaths, cycle routes and bus services both within the town and to link with the countryside and other settlements. Introduce through-route large vehicle traffic management measures; and promote a North-South relief road.
- **Infrastructure** - ensure quality, accessible recreational facilities and secure drainage improvements for the town to mitigate the likely environmental impact of new housing.
- **Environment** - make sure that any development does not harm wildlife and habitats in the Axminster area.



Axminster

Axminster



## Rejected Options for Axminster

8.10 The following options have been rejected for Axminster:

1. **No allocation for housing:** to not allocate housing land to accommodate the scale of growth wanted for Axminster would be counter to the preferred strategy.
2. **Allocations on land to the South of the town:** options sites have been excluded as they have restricted access and fall within flood zones 2 and 3. For the site adjacent to Abbey Close, it is within the East Devon Area of Outstanding Natural Beauty.

### How we reached this Policy Position

The preferred approach sets a strategy for larger scale housing growth to promote and be a catalyst for further commercial activity. A strategic allocation was proposed for residential, commercial and recreational provision North of Cloakham Lawns. There was a focus on town centre regeneration with improved traffic management.

There is now a resolution to grant planning permission at Cloakham Lawns (subject to legal challenge) and the new Local Plan reconfirms this allocation.

Additional development is proposed to the North and East of the town in line with community aspirations for growth. This is not considered appropriate until and unless improvements have been made to the train service to Cranbrook and Exeter so that future residents can take advantage of a range of job opportunities using sustainable transport modes.

**TO MAKE COMMENTS ON CHAPTER 8:**  
**AXMINSTER visit:**  
**[www.eastdevon.gov.uk/draftlocalplan8](http://www.eastdevon.gov.uk/draftlocalplan8)**

## **9 Budleigh Salterton**

### **The Future for Budleigh Salterton**

9.1 Our summary vision and strategy for Budleigh Salterton is one of:

Continuing to serve as a focal point for services and facilities serving a local catchment area and to act as a tourism destination. Provision is made for modest future housing development and key sources of employment, including retail services and tourism, will be protected and supported.

### **Budleigh Salterton Now**

9.2 Budleigh Salterton is a small coastal town with about 5,200 residents, 39% of whom are 65 or over. There are no major employment sites in the town and the retail, services and tourism industries are relied on to support the local economy. The whole town is within the East Devon Area of Outstanding Natural Beauty. There are Coastal Preservation areas to the West and East. The Town Centre and land to the North West of it is a designated Conservation Area and there are three County Wildlife Sites within the green wedge separating Exmouth Road from Knowle Road. As a result there are tight constraints upon development within and adjoining the town, quite apart from the green spaces and countryside views, which need to be conserved. The Otter Estuary, in Otterton Parish abutting Budleigh Salterton, is a Site of Special Scientific Interest and must be protected from boating and other human activity disturbing wildlife.

### **Budleigh Salterton: The Future**

9.3 We will conserve and enhance Budleigh Salterton by ensuring that:

- the attractiveness of the town centre (though somewhat congested with traffic), the adjoining countryside (especially the Estuary) and the extensive beach will continue to attract visitors from other parts of Devon and further afield who will spend money in the many small shops and restaurants.
- The landscape designation constraints conserve the town's fine assets and make it an attractive destination.
- the numerous small businesses will provide the town's principal local source of employment.
- in view of the high proportion of elderly residents in the town, medical and care facilities are of extra importance and favourable consideration will be given to their improvement and provision.
- we protect the high quality landscape setting of the town by resisting development that would impinge upon the Area of Outstanding Natural Beauty and other designations in and around Budleigh Salterton.
- we conserve and enhance the Conservation Area by requiring new developments and redevelopment to be of a high design standard that is appropriate to its location and surroundings.



- Resist any development and land uses that would detract from the outstanding wildlife value of the Otter Estuary.

### **Consultation Local Plan – Draft Strategy 16**

#### **Budleigh Salterton**

The principal consideration for Budleigh Salterton will be the conservation of its outstanding natural environment and affordable housing and employment uses will be given priority over other forms of development. Provision will be made for development of around 100 new homes through the Local Plan in accordance with adopted Design Statement.

### **How we reached this Policy Position**

As part of the early Local Development Framework preparation this Council held a meeting with the Town Council. The issues identified were:

Continuing to meet the day to day needs of residents and visitors with any development controlled to retain the town's character.

- Protecting the landscape and historic character.
- Providing a footpath along West Hill Road, whilst retaining roadside trees and hedgerows.
- Continue to attract and accommodate large numbers of visitors.

At Preferred Approach stage Budleigh Salterton was categorised as one of the 'Hub Towns and Villages' with an allowance of about 50 dwellings in the period until 2026 and the onus on meeting local employment needs and supporting the appropriate expansion of existing businesses. However, it is considered that Budleigh Salterton should be treated as one of the main towns in the District and whilst no land is to be allocated for development, it should not be prevented from accommodating limited expansion provided it does not detract from the natural environment of the town.





**TO MAKE COMMENTS ON CHAPTER 9:  
BUDLEIGH SALTERTON visit:  
[www.eastdevon.gov.uk/draftlocalplan9](http://www.eastdevon.gov.uk/draftlocalplan9)**

## 10 Exmouth

### The Future for Exmouth

10.1 Our summary vision and strategy for Exmouth is one of:

Substantial housing provision, including affordable housing, and an employment led regeneration agenda. We will seek to reduce out commuting through indigenous employment growth and tourism related development. A focus will be on town centre enhancement, improved retail provision and community facilities with strategic allocations on the Northern and Southern sides of the town. We will plan for the completion of Dinan Way and to improve public transport links to Exeter.

10.2 Feedback and evidence is set out below:

#### **What you said about the future for Exmouth:**

- There have been mixed messages about the total scale of housing development desired in Exmouth.
- Medium scale employment growth has generally been favoured.
- Through the Issues and Options Consultation there was no overall consensus on best locations for future development though Northerly and Easterly expansion received limited support.
- Concerns have been raised about high levels of commuting out of the town to jobs in Exeter and congestion on the A376 and also inadequate train provision.
- Support for completion of Dinan Way was expressed in the Issues and Options Consultation though this was not overwhelming.
- Need for more affordable housing has been highlighted as a key issue.
- Considerable concern has been expressed over the future of Rolle College and support expressed for community/education uses.
- The two key strategic housing allocations sites allocated in the plan are particularly suited to residential development. A study was undertaken of potential allocation sites in 2009.<sup>15</sup>

#### **What the Sustainability Appraisal and Evidence tell us about the future of Exmouth:**

- Development is likely to affect the internationally protected wildlife and habitat sites of the East Devon Heaths, Exe Estuary and Dawlish Warren, through increased traffic movements, pressure for recreation, and water quality and supply. Any building for homes or jobs in or adjoining Exmouth would need to be further tested ("Appropriate Assessment") (Initial Screening Report, Habitat Regulations Assessment 2010).
- Increased housing in Exmouth should be matched by job and service provision to assist the town's self-containment, reduce commuting, cut negative effects on air quality and also improve access to services. However, any new homes may have damaging effects environmentally, in particular by putting pressure on the Coastal Preservation Area and

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<sup>15</sup> EDDC (2009) "Exmouth Evaluation of Potential Strategic Allocations"



the AONB for recreation or simply through loss to the built form (Sustainability Appraisal 2010).

- Development for commerce and jobs within the town may improve its self-containment, especially if diversifying the economic base. This could help to reduce commuting to Exeter and therefore be beneficial to the town's environment, regenerate brownfield sites and protect the surrounding countryside from harm. However, flood risk issues within the built-up area would need to be addressed (Sustainability Appraisal 2010).
- The completion of Dinan Way through developer contributions, may result in the benefits of completing the road being negated by additional traffic generated. (Sustainability Appraisal 2010).
- The March 2011 East Devon Strategic Housing Land Availability Assessment indicates that there is a potential supply of 'developable' land for 861 homes in Exmouth Parish to 2025, in addition to those with planning permission yet to be built.

## Exmouth Now

- 10.3 Exmouth is the largest town in Devon and is an important commercial and residential centre. During the 18th century the town established itself as a destination for the wealthy. When the railway came to Exmouth in the 1860s the tourism industry expanded and the Victorian seaside character of the town was established. Exmouth remains an important visitor destination and its 3 kilometres (2 miles) of sandy beaches are a major draw. The updated retail assessment by GVA Grimley<sup>16</sup> confirms Exmouth as the largest retail centre in East Devon, both by floor space and number of units with the highest number of national multiples. There are very good levels of food shopping retention although these are dominated by the out of centre Tesco. 50% of non food shopping trips are retained in the town and there is additional capacity for both food and non-food shopping. The holiday season is dominated by high summer visitor levels. The town supports numerous hotels and bed and breakfast establishments and also the substantial Devon Cliffs Holiday Park.
- 10.4 The town centre lies close to the sea and estuary and shopping. Tourist and commercial attractions are concentrated into the South Western edge of the town close to the estuary and sea. The town stretches inland to the North and East for around 3 kilometres (2 miles) with much of the outward expansion occurring in the late 20th century. The town centre is remote from most Exmouth residents and many outlying areas, especially to the North of the town, are poorly served by community and commercial facilities.
- 10.5 Exmouth has a population of around 36,000 people and although there are important businesses located in the town it mainly acts as a dormitory town. The 2001 census showed Exmouth having an economically active population of around 14,500 people but around 6,500 of these commuted out to jobs elsewhere with just over half of them to Exeter.
- 10.6 In addition to its substantial summer tourist trade Exmouth serves as a regional centre for water sports, including sailing, wind-surfing and kite surfing, for which the town has

<sup>16</sup> GVA (2011) "East Devon Retail Study – Update 2011"

a national reputation. More leisurely outdoor activities, such as bird-watching and walking, are popular and a cycle way links Exmouth to Exeter. The Exe Estuary is an important wildlife resource and is noted for its wading and migrating birds. Much of the estuary has European Protected status as a nature reserve. Exmouth marks the Western end of the Jurassic Coast World Heritage Site.

10.7 The Council, with partners, has developed various initiatives aimed at promoting and enhancing Exmouth, including environmental improvement schemes in the town centre and along the waterfront<sup>17</sup>. In 2010 East Devon District and Devon County Councils appointed LDA Design to undertake a comprehensive Study for the town centre including the preparation of proposals and a delivery plan to encourage investment in the Royal Avenue, estuaryside and London Inn areas. The Local Plan will incorporate the key findings of the Masterplan<sup>18</sup> work. We will seek to adopt its proposals as a Supplementary Planning Document.

10.8 We will enhance Exmouth by:

- Promoting a range of services and an improved town centre to meet local needs for shopping and community facilities.
- Encouraging town centre retail development with a new supermarket being key to securing additional retail activity, business confidence, investment and jobs.
- Promoting new employment to reduce the need for out-commuting for work, and work-related training.
- Promoting new recreational, health and educational facilities, further assisting in the regeneration of the area and helping to meet the needs of residents. A particular emphasis will be attached to local area facility provision in the North of the town.
- Planning for completion of Dinan Way to help remove traffic from residential streets and ease access to the South Eastern parts of the town.
- Promoting enhancement of public transport links to Exeter through increased services and longer trains.
- Promoting the town as a high quality tourist destination capitalising on its waterfront assets.
- Seeking to secure 'care' and 'extra care' housing provision in the town for the elderly.
- Conserve and enhance the built environment and historic qualities of Exmouth and promote these as assets for visitors to the town and residents.
- Conserve and enhance the natural environmental qualities of the River Exe and its estuary and also the Area of Outstanding Natural Beauty and other countryside assets.
- Working with partners, seek to reduce the adverse impacts of traffic on the town centre.
- Enhance the visual appearance of the town.
- Encourage walkers and cyclists to the Exe Estuary trail and promote completion and use of Valley Parks and leisure routes in and around Exmouth<sup>19</sup>.

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<sup>17</sup> EDDC (2004) "Orcombe Point Development Brief"

<sup>18</sup> LDA Design (2011) "Exmouth Masterplan"

<sup>19</sup> Exmouth Cyclepath Working Group (2009) "A Strategy for Cyclepaths in Exmouth"

- 10.9 At the Former Rolle College campus site there are proposals for a mixed use development comprising housing, employment and education uses. A social enterprise company, Rolle Exmouth Ltd, has until 2014 to raise funds to purchase about half the site with Plymouth University selling the remainder for housing. Other housing opportunities could be provided through infill opportunities or through outward expansion of the town.

### **Consultation Local Plan – Draft Strategy 17**

#### **Development at Exmouth:**

The preferred approach for Exmouth will see larger scale development. Working with our partners in Exmouth, over the 2011 to 2026 period, we will specifically plan for and promote:

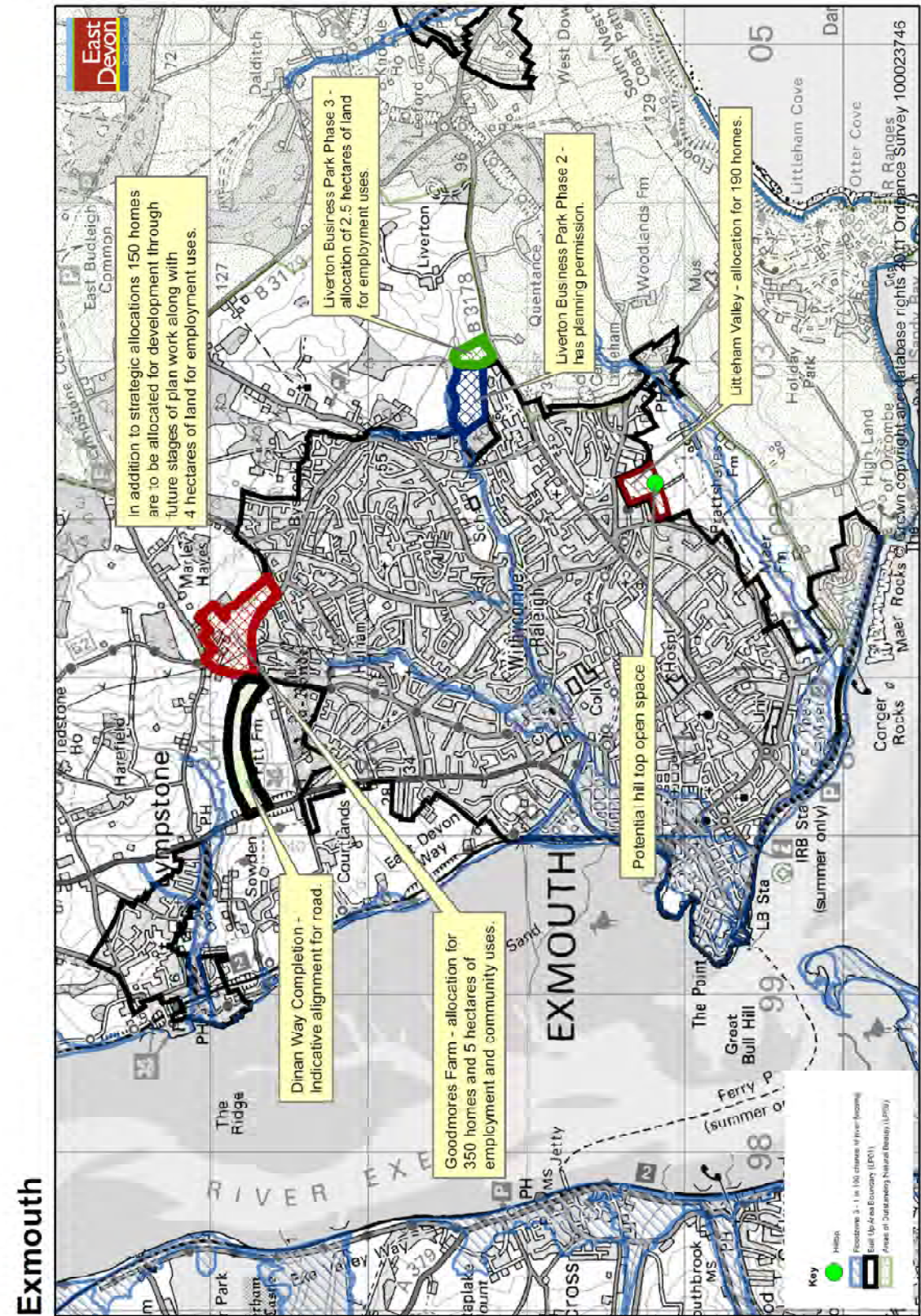
1. **New Homes** - around 830 homes to be built, in addition to the homes already with planning permission or under construction.
2. **Jobs** - significant new employment provision is proposed for the town.
3. **Town Centre** - significant investment in new retail and commercial facilities in the town centre is proposed.
4. **Social and Community and Leisure Facilities** - new facilities to serve the needs of residents. These include enhanced medical services, library and other commercial services.
5. **Infrastructure:**
  - upgrading of public transport provision to Exeter, primarily through enhancement of public transport improvements.
  - Completion of Dinan Way, this highway completion is likely to require developer contribution funding from all future developments in or near to Exmouth.

The current Local Plan Built-up Area Boundary for Exmouth will be retained, however strategic land allocations are proposed at the following locations:

- a) **Goodmores Farm** - mixed use development for 350 homes and around 5 hectares of land for mixed use employment (3ha) and community and commercial facilities.
- b) **Phase 3 at Liverton Business Park** - around 3 hectares of employment land. **Liverton Phase 2** does have planning permission but it is also calculated into in allocations with 8 hectares.
- c) **Littleham Valley** - around 190 new homes.
- d) In addition to these strategic allocations 150 homes will be accommodated on sites to be identified through future phases of plan production.



Exmouth



## Rejected Options

10.10 The following options for development at Exmouth have been rejected:

1. **Much larger scale development** - a very large scale development, particularly if not accompanied by very substantial employment provision, would be likely to add considerably to outward commuting to jobs in Exeter.
2. **Modest or small scale development** - lower levels of development would limit the ability to secure employment and social and community facilities for Exmouth and would not complement the objectives of securing necessary infrastructure investment in the town. Housing need in Exmouth is high including for affordable housing. Higher housing levels will help secure more affordable housing.
3. **Development without supporting infrastructure** - consultation responses received highlighted the fact there are limitations on social and community infrastructure provision. It would be inappropriate to not seek to secure extra facilities for the town.

### How we reached this Policy Position

The Preferred Approach indicated a target of about 1,850 homes to be built on strategic sites allocated for development. An evaluation of potential strategic allocations was completed in January 2010 following a large number of sites being considered under the Strategic Housing Land Availability Assessment. The evaluation referred to 14 sites but most were dismissed as too small to be 'strategic' or else had problems such as being within a flood risk area.

Landowners made presentations to the Local Development Framework Panel in respect of four sites – land North of Dinan Way, East of St John's Road, North of Liverton Business Park and off of Littleham Road. The consultation on the Preferred Approach resulted in a considerable number of objections, principally in respect of the high number of homes being proposed. The site at St John's Wood, with 1,000 houses proposed attracted by far the most criticism, including from the Town Council. The evaluation of this site highlighted the potential impact on the landscape, the loss of countryside and agricultural land, the very poor highway access, the presence of legally protected species and the setting of the listed St John in the Wilderness Church. Therefore this site has been deleted from the suggested allocations.

About half of the former Rolle College campus is to be purchased by Rolle Exmouth Ltd, a not-for-profit community organisation, and under the terms of the agreement with Plymouth University it could be used for various purposes. The project is for:-

- (a) education and training, mainly academic and vocational courses for 16-19 year olds.
- (b) community issues – exhibitions, theatrical and musical performances, conferences etc
- (c) one building will be made available as serviced offices for small or start-up businesses.
- (d) The remainder of the former campus would be sold for housing by Plymouth University.

These proposals are considered likely to be of considerable benefit to the community and the site is therefore added to the proposed allocations, for mixed use development.

It should be noted that future drafts of the Local Plan may need to be updated to reflect the findings of the LDA Masterplan<sup>20</sup> work. This could impact on both Strategic and Development Management Policies which will may need to be amended to reflect changes to the plan.

<sup>20</sup> LDA Design (2011) "Exmouth Masterplan"



**TO MAKE COMMENTS ON CHAPTER 10:  
EXMOUTH visit:  
[www.eastdevon.gov.uk/draftlocalplan10](http://www.eastdevon.gov.uk/draftlocalplan10)**



# 11 Honiton

## The Future for Honiton

### 11.1 Our summary vision and strategy for Honiton is:

Honiton is identified as a focus for economic development and modest housing growth. We will build on community aspirations for a vibrant local economy based on a niche market town with well integrated transport network and opportunities for physical activity. We will seek to secure indigenous employment growth as well as inward investment to establish Honiton as a major employment and commercial focal point in East Devon. This would reflect the central position of Honiton in the District, its substantial catchment population and excellent road and rail links. We will promote regeneration initiatives at Ottery Moor Lane and provide a strategic employment allocation to the West of Hayne Lane. We will identify sites for 300 new homes in addition to 150 new homes on the Ottery Moor Lane site.

### 11.2 Feedback and evidence is set out below:

#### **What you said about the future of Honiton:**

- New affordable housing is needed in Honiton for local young people, families and those with a disability as well as good quality care and sheltered homes for older people.
- In the Issues and Options consultation the most favoured development levels were very high (1,000 dwellings or higher) to help secure affordable housing and some new infrastructure. A close second was moderate levels of around 500 dwellings with some affordable housing and additional infrastructure.
- Modest levels of employment development with small scale greenfield development and infilling were supported, as were significant greenfield development to attract major inward investment.
- There was some support for bulky goods retailing in Honiton and limited agreement that this should be on Heath Park.
- There was hardly any support for a Northerly or Southerly expansion of Honiton.
- The most favoured growth direction for Honiton was to the East, closely followed by the West and 'infill' in the existing town.
- The AONB and rural views around Honiton must be protected from development.
- There is a lack of community buildings, sports pitches and recreational areas.
- There are some issues with traffic congestion in the town centre.
- More tourist accommodation is needed in the town centre.

#### **What the sustainability appraisal and evidence tells us about the future of Honiton:**

- The 2011 East Devon Strategic Housing Land Availability Assessment indicates there is a potential supply of 'developable' land within and surrounding Honiton to accommodate around 759 homes up to 2025.
- Development in or adjoining Honiton would be unlikely to impact directly on any internationally protected wildlife and habitat sites, as none abut the town. However, longer-range recreational and traffic increase pressures may need to be addressed, as

and when schemes come forward (Initial Screening Report, Habitat Regulations Assessment 2010).

- The current deficit in services and jobs for the existing population should be tackled before additional housing is proposed. Flood risk and AONB designations abutting the town constrain its expansion. So, brownfield site redevelopment for homes, commerce and jobs would prove much more sustainable, to cut out-commuting, use existing excellent public transport routes and conserve and enhance the environment of the town and of its landscape context. (Sustainability Assessment 2010).
- An assessment of potential strategic allocations for Honiton was undertaken in 2009 and this identified scope for the Westward expansion of the town.<sup>21</sup>

## Honiton Now

11.3 Honiton is centrally located in East Devon and acts as a focus for shopping, employment and services for the surrounding rural area. The town nestles into the Otter Valley and has a stunning rural setting falling between two Areas of Outstanding Natural Beauty. Honiton has the best transport links of all the towns in East Devon, benefiting from a train station on the Exeter to Waterloo line and the main A30 East-West road link which skirts the North of the town. There is a long, distinctive and very wide main street flanked by Listed Buildings, which forms the main town centre. This is noted for its antique shops that attract visitors to the town, but an out of town Tesco store dominates the food market and an out town Lidl's has recently opened. A recently updated retail study<sup>22</sup> (by GVA Grimley) found Honiton to have a reasonable healthy town centre with a niche shopping role and a low vacancy rate. There is capacity for additional non-food shopping, but very little capacity for extra food shopping.

11.4 Honiton has been the focus for a large proportion of the District's recent housing provision, with the population more than doubling between 1970 and 2008 from 5000 to 12000. Industrial land has also been developed and some of this land in 'Heath Park' to the West of the town has been used for non-food shopping. The population expansion has not been accompanied by an increase in community facilities and there is a shortage of open space, sports pitches and community facilities. There are opportunities for redevelopment of underused land within the town, including at Ottery Moor Lane, that could provide sites for jobs and homes, but options for town expansion are severely limited by highway, topography, flooding, landscape and land ownership issues.

## Honiton: The Future

11.5 Honiton will act as a focal point for jobs, shops, recreation and cultural facilities to serve local need including the smaller surrounding settlements. The town centre will be the focus for commercial uses to retain vitality but opportunities will also be available for redevelopment at Ottery Moor Lane and a new employment development to the West of the town. The fact that Honiton has good transport links and is central to the District is key to the employment-oriented growth agenda for the town that can

<sup>21</sup> EDDC (2009) "Honiton Evaluation of Potential Strategic Allocations"

<sup>22</sup> GVA (2011) "East Devon Retail Study – Update 2011"

genuinely compete with other larger centres to attract major strategic inward employment investment. A strategic employment allocation of 15 hectares is proposed to the West of Hayne Lane and North of the railway line to take advantage of Honiton's advantageous business location. Whilst 15 hectares is a relatively large allocation for Honiton, the costs of providing infrastructure for the site are high and a smaller allocation is unlikely to be viable. The agents for the majority land owner have stated that an employment allocation on this scale here would be independently viable. It should be noted that East Devon District Council own part of the land proposed for employment. It was purchased for recreational purposes and there is a legal clause restricting the use to recreation. The Council has not confirmed whether their land is available for development.

- 11.6 There is an aspiration for an A35 relief road and possible development to the East of Honiton, commensurate with this objective, could help with provision.
- 11.7 The strategic advantages of Honiton's central East Devon location, close to the proposed employment sites in the 'West End' also make it a logical focus for additional housing.
- 11.8 Extensive representations have been made on behalf of the majority landowner of the Hayne Lane sites during the plan preparation process. The agents for the site confirmed their client's commitment to bringing the land forward for development in June 2011. The agents also state that both the employment allocation and the housing allocation would be independently viable and sufficiently attractive to the market to ensure delivery. This would include the cost of improvements to the Turk's Head junction (as agreed by the Highways Agency) to accommodate the proposed levels of development and 40% affordable housing. However, there have been criticisms of housing in this location particularly from the Town and relevant Parish Councils. Given the local concerns and the relatively small size of the allocation, which make it difficult to justify as a 'strategic' allocation, it is not proposed that land West of Hayne Lane is proposed as a strategic housing allocation. Sites to accommodate 300 homes, which may, or may not include the Hayne Lane site, will be identified through a formal site identification process that takes account of local representations, the emerging planning strategy and national planning policy.
- 11.9 Land at **Ottery Moor Lane** is proposed for mixed-use redevelopment, including housing, in the preferred approach. The location of the site which is close to the town centre but with easy access to countryside along the Otter Valley, could make it an attractive location for relatively high-density housing as part of a mix of uses. In terms of deliverability there are concerns as the site has multiple owners and there is no evidence that this site is available for redevelopment, such as a 'Strategic Housing Land Availability Assessment' submission. There are also concerns about the viability of redevelopment for housing given existing land values. However, there was an application on part of the site for a supermarket in 2008. This suggests that there may be scope for redevelopment. Given the potential of the site to deliver additional employment opportunities and homes in a location central to the town it is considered that this allocation should be retained, while recognising that it may not be delivered

until late in the plan period. Alternative sites to deliver the 150 dwellings proposed would need to be identified if deliverability cannot be demonstrated.

11.10 We will enhance Honiton by:

- Directing new retail, leisure, tourist and major community uses to the town centre, unless there are no suitable sites available.
- Allocating land for employment uses on land to the West of Heath Park, subject to the implementation of highway improvements at the 'Turk's Head' junction. This will provide opportunities for local businesses to expand and provide sites for the relocation of existing industrial uses at Ottery Moor Lane to enable better use of this centrally located site.
- Promoting the redevelopment of underused land at Ottery Moor Lane for a mix of housing and employment uses to include 150 new homes Meeting Honiton's housing needs through redevelopment opportunities within the town and by identifying sites for 300 homes in addition to the 150 at Ottery Moor Lane, subject to highway and landscape considerations.
- Improving sporting, cultural and community facilities to serve Honiton and the surrounding rural area by requiring new provision in any large new development and supporting community initiatives to develop these; these considerations are highlighted in a Honiton Town Plan<sup>23</sup>.
- Encouraging the provision of sports pitches on hill top land to the South of the town in line with community aspirations.
- Conserve the setting of Honiton in the landscape by not allowing inappropriate development in Areas of Outstanding Natural Beauty.
- Conserve and enhance the environmental quality of the town centre as the major asset for visitors to the town and a key resource for residents.
- Support community initiatives to extend the network of green links to surrounding countryside.
- Seek ways of reducing the level of heavy goods vehicles in the town centre.
- Introduce measures to improve air quality if necessary.
- Require the strategic employment allocation to the West of Honiton to be designed at the outset to the highest sustainability standards.

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<sup>23</sup> Honiton Town Council (2004) "Honiton Town Plan"

## **Consultation Local Plan – Draft Strategy 18**

### **Development at Honiton:**

The preferred approach will see a moderate scale of development through the Local Plan. Working with our partners in Honiton we will focus on improvements to the existing urban fabric and particularly the town centre to help sustain a vibrant and economically active town, meeting its own needs and those of the wider countryside.

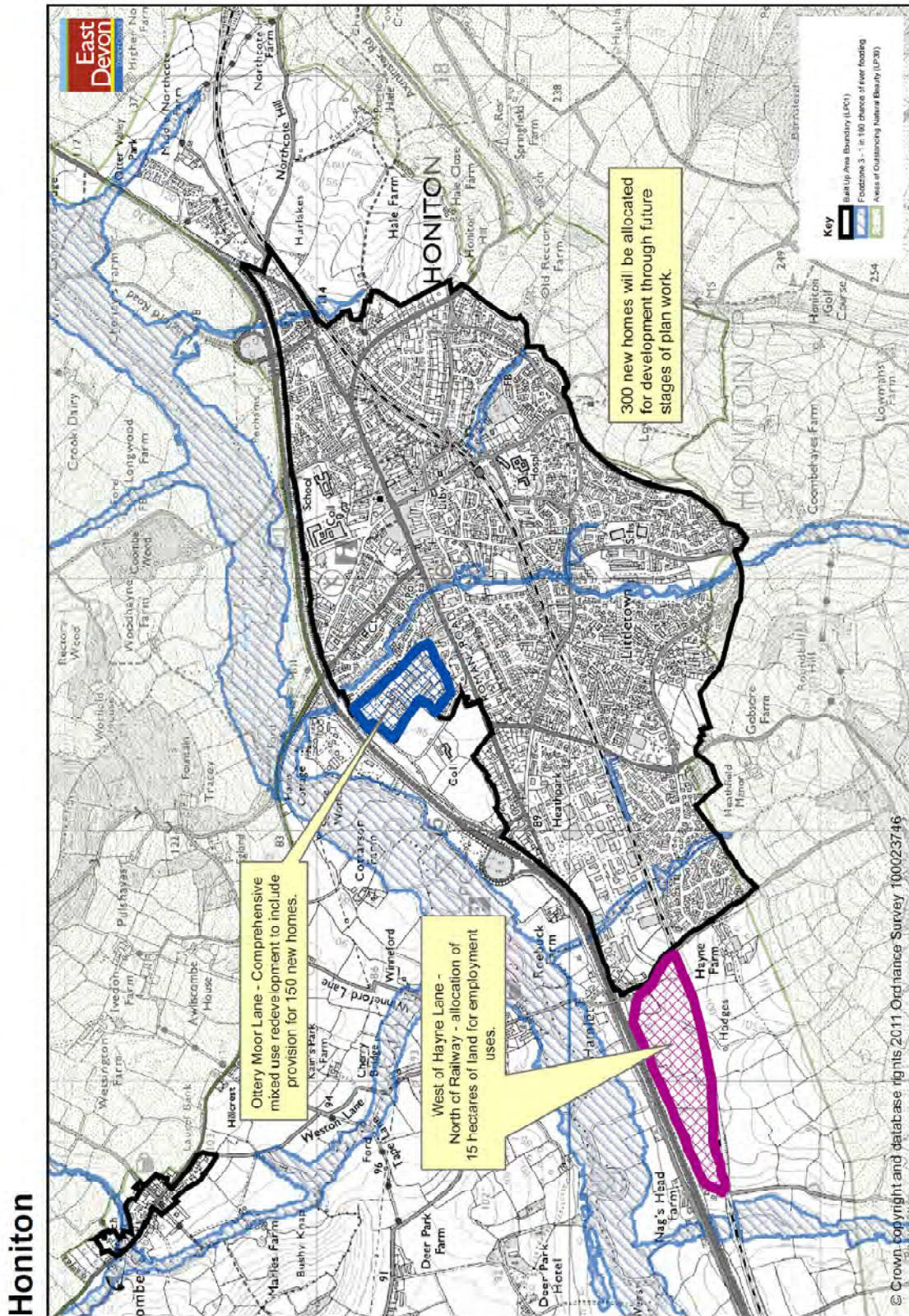
1. **New Homes** – Sites will be identified for an additional 300 homes plus 150 new homes as part of the redevelopment site at Ottery Moor Lane. The preference will be to identify housing sites within the existing Built-up Area boundary but if this is not possible consideration will be given to sites adjoining the existing town boundary.
2. **Town Centre** - enhancement of the environment and promoting business opportunities in the town centre will provide the focus for jobs, shops, tourism, leisure and recreation.
3. **Jobs** - a 15 hectare site will be allocated for employment (B Use Classes) uses to the West of Honiton.
4. **Social and Community Facilities** - will be required to support new developments and support will be given to local aspirations for new and improved facilities.
5. **Infrastructure** - New developments will meet their own infrastructure requirements and improvements at Turk's Head junction will be needed to support the strategic allocations.

The current Built-up Area Boundary for Honiton will be retained until and unless suitable housing sites for 300 homes cannot be found within the existing boundary. Strategic land allocations are proposed at the following locations:

- a) **West of Hayne Lane North of the railway** - around 15 hectares of land is allocated for B1 employment uses.
- b) **At Ottery Moor Lane** - for mixed use regeneration purposes to include 150 new homes.



## Honiton





## Rejected Options

11.11 The following options for development at Honiton have been rejected:

1. **Large scale development** - large or larger scale development to meet the wider housing needs of the district are not being proposed due to highway and environmental constraints on available land. The focus is on employment uses.
2. **Development without supporting infrastructure** - consultation responses received highlighted the fact there are limitations on social and community infrastructure provision already. Extra facilities for the town are a priority.
3. **Strategic housing allocations** – the scale of housing growth planned for Honiton is not large enough to warrant a strategic housing allocation.

### How we reached this Policy Position

The preferred approach set a moderate scale of development with a strategic allocation for 300 homes West of Hayne Lane, mixed use redevelopment at Ottery Moor Lane plus additional housing within the town, although a figure was not specified.

In the general responses to the Preferred Approach there was a feeling that too much housing had already been built in Honiton without proportionate increases in employment, leisure and recreation facilities. Respondents valued the high quality landscape setting of Honiton and wished to see this and the environmental qualities of the town conserved and enhanced. The proposed scale of housing growth and land allocations for housing and employment to the West of the town, were criticised by both the Town and relevant Parish Councils. Some respondents felt that larger scale development should be located to the East of the town. In this location development could help facilitate or provide for the development of an Eastern bypass to the town (directly linking the A30 to the A35). These options had been considered when the Preferred Approach was developed, but at that time sites to the East were not considered to be deliverable. In contrast there was evidence that the sites West of Hayne Lane could be delivered, together with a 40% contribution to affordable housing and the required highway improvements to the Turk's Head junction. However, in view of the representations received and the relatively modest scale of a Hayne Lane housing allocation that may be difficult to argue is 'strategic'. The 300 homes West of Honiton are not currently proposed. Instead, sites for 300 homes will be identified through future phases of plan production (under Part Two Development Management policies), either within or outside of the Built-up Area boundary, although the first preference will be for sites within the town. The Western extension of Honiton for residential use was felt to be undesirable on account of it leading to an extended linear expansion of the town and a preference to see new homes built in the existing Built-up Area Boundary of the town.

There was general support for town centre regeneration initiatives through calls for more to be done to enhance the town and to make it more pedestrian friendly. The employment led agenda set out for Honiton in the preferred approach also received support. The Town Council and Parish councils were critical of the proposed West of Hayne Lane North of the railway strategic employment allocation. There were also questions over whether the scale of proposed employment provision was appropriate and could be justified. It is recognised that the continued health of the town centre will be critical to future employment opportunities in

Honiton, but additional employment land with easy access to the A30 will add to the diversity of job opportunities in the town. It also capitalises on the business advantages of Honiton, close to the main employment areas around Exeter and with excellent links to the trunk road network. There are limited options for standard 'industrial' employment sites in Honiton due to requirements for fairly flat land with good access to the main road network. A range of sites was considered prior to the preferred options and no other sites were considered feasible. 15 hectares is considered a large enough allocation to facilitate the infrastructure improvements needed to develop the site.

Regeneration at Ottery Moor Lane received very limited representation although comments included support for redevelopment and support for small business units and technology based workshops. Young people suggested this would be a good site for a cinema, paintball arena and shops. In line with the strategy for Honiton of focussing on improvements to the existing urban fabric to help sustain a vibrant and economically active town, the regeneration proposals have been retained notwithstanding the current lack of evidence on deliverability. In addition a figure of 150 homes has been added to reflect the scale of the site and its potential for higher density development, given its central location.

**TO MAKE COMMENTS ON CHAPTER 11:  
HONITON visit:  
[www.eastdevon.gov.uk/draftlocalplan11](http://www.eastdevon.gov.uk/draftlocalplan11)**

## 12 Ottery St Mary

### The Future for Ottery St Mary

12.1 Our summary vision and strategy for Ottery St Mary is one of:

In recognition of its proximity to the West End, potential for expanding high quality West End public transport to Ottery St. Mary and current retail expansion in the town moderate housing growth is proposed. This will include a strategic allocation to the West of the town for 350 new homes, school enhancement and other facilities, to reflect local desires for improvements to the King's School which is now an Academy. Modest employment growth is proposed, primarily to support locally generated needs with a focus on town centre regeneration and enhancing the retail and commercial vitality of the town, whilst conserving and enhancing the fine built heritage of Ottery St Mary.

12.2 Evidence and feedback is set out below:

#### **What you said about the future of Ottery St Mary:**

- Modest future residential development (up to 250 dwellings) was the most favoured scale of development from the Issues and Options consultation.
- Housing most importantly should be for local needs with supporting infrastructure.
- Development West of town received most support with some support for Southerly development.
- Inadequate road system and congestion in Ottery St Mary was highlighted.
- Support for increased employment provision, though less so if using green field land.
- Potential for tourism expansion, sports provision was felt to be inadequate,
- Town centre enhancement required with support for more retail provision. Marginally higher support for than opposition to a supermarket.
- Green spaces around Ottery should be conserved and enhanced.

#### **What the Sustainability Appraisal and Evidence tells us about the future of Ottery St Mary:**

- The GVA Grimley Retail Study<sup>24</sup> showed that prior to the completion of the Sainsbury store many Ottery residents shopped elsewhere. Concern has however, been raised that the new supermarket in the town It could harm existing traders and increase the food's carbon footprint. A counter view is however, that it will provide jobs and encourage residents to shop in the town and attract people from elsewhere.
- Development within the town or on surrounding greenfield land could well damage protected wildlife and habitats.
- There is no support for large numbers of new homes in or adjoining Ottery. It could become dormitory accommodation for Exeter and increase commuter out-flow.
- The Sustainability Assessment 2010 suggested that major employment development would be unable to compete with the 'West End' and Honiton.

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<sup>24</sup>GVA (2011) "East Devon Retail Study – Update 2011"

- The March 2011 Strategic Housing Land Availability Assessment shows potential for around 580 new homes in Ottery St Mary Parish in the next 15 years although the parish includes a number of surrounding rural settlements.
- Development on greenfield sites could help social and economic well-being but the environmental impacts would be poor. Air and noise pollution, water and soil quality could be adversely affected by regenerating brownfield sites.

## **Ottery St Mary Now**

- 12.3 Ottery St Mary has around 4,500 to 5,000 residents and is a very attractive and long established small town with a historic core of great architectural value. The town centre has however, struggled to remain vibrant and parts of the town are subject to flooding from the river Otter. The sewage plant serving Ottery St Mary is at capacity and major works are required before extra larger scale development can be permitted. This will reduce potential for development in the shorter term, although it will be possible for South West Water to plan for the major works required in order to deliver the scale of development proposed.
- 12.4 A major supermarket of 20,000 square feet floor space has recently been completed and should reduce the number of residents of the town leaving Ottery St Mary to shop elsewhere. Furthermore, the new supermarket should attract additional people into the town and encourage additional retail visits to other shops and businesses. The updated GVA Grimley retail study<sup>25</sup> has found that Ottery St Mary has a high proportion of food and service outlets with low numbers of non-food units. There are low vacancy rates but poor levels of bulk food trip retention although this may be redressed with the new supermarket.
- 12.5 Ottery St Mary has reasonable bus links but does not have a railway station. Road links out of the town, going Westward towards Exeter, are very good but narrow roads and one way streets and pinch points affect the flow of traffic in a number of parts of the town. The proposed high quality transport to serve Cranbrook might usefully connect to Ottery St Mary resulting in a more attractive bus service. Many residents commute to work and there are limited jobs available in the town. The King's School has developed a very good reputation attracting students from a wide surrounding area but it operates from a constrained site with sports pitches separated from the school by a main road. A new proposed allocation for mixed uses (residential and education) could cater for 350 homes and allow for expansion or redevelopment of the King's School. A report produced for Procter Land LLP in September 2011 provides more details on possible potential for development West of Ottery St Mary<sup>26</sup>. Whilst the town has a range of facilities the library is substandard and difficult to access for the disabled. The town attracts a small number of tourists but with its connections to Coleridge, fine buildings and impressive setting alongside the River Otter offers further potential.

<sup>25</sup> GVA (2011) "East Devon Retail Study – Update 2011"

<sup>26</sup> LHC Urbanism and PCL Planning for Procter Land LLP (2011) "Land at 'Island Farm', Barrack Road"

## **Ottery St Mary: The Future**

12.6 Ottery St Mary will continue to be an appealing town where employment and housing development will be promoted to meet local needs. The focus of attention will be on the town centre with enhanced retail provision and commercial vitality being key priorities. Ottery St Mary town centre and its facilities serve the town and surrounding hinterland and we will aim to consolidate and enhance this.

12.7 We will enhance Ottery St Mary by:

- Promoting linked shopping trips to the shops and businesses in the town. High quality pedestrian access from the supermarket to the town will be critical.
- Identifying sites to accommodate 400 dwellings to include a site for education uses and 350 new homes.
- Improving sporting, cultural and community facilities to serve Ottery St Mary and the surrounding rural area by seeking new facilities or enhancements to existing facilities in parallel with other developments.
- Promoting a mixed use redevelopment of the redundant Cutler Hammer factory site to include housing, community uses and potentially a library.
- In working with the education authority to identify potential options for improved facilities at the King's School (now an Academy).
- Conserving the built environment and historic qualities of Ottery St Mary, especially in the town centre, and promote these as assets for visitors to the town and residents. An Ottery St Mary town plan picks up on many of these themes<sup>27</sup>.
- Supporting community initiatives to extend the network of green links to the surrounding countryside.
- Promoting links to the river Otter and to footpaths along the river.
- Working with partners, seek to reduce the congestion in the town centre, taking the town's narrow streets into account.
- Promoting measures to reduce potential future flooding and avoid development on the extensive flood zones to the West and North of the town.
- Enhancing the visual appearance of the Western side of the town, recognising its importance as a 'gateway entrance' to Ottery St Mary.

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<sup>27</sup> OSM Town Council (2007) "Ottery St Mary Town Plan"

## **Consultation Local Plan – Draft Strategy 19**

### **Development at Ottery St Mary:**

The preferred approach for Ottery St Mary will see development focused on meeting local needs and making the town a more vibrant centre. The viability of the town centre will be enhanced through additional housing development which reflects the town's proximity to the West End and potential for expanding high quality public transport links to it.

### **Working with our partners in Ottery St Mary, over the 2011 to 2026 period, we will specifically plan for and promote:**

1. **New Homes** - an additional 400 new homes to be provided on sites, including 350 homes as part of a strategic allocation for mixed uses (residential and education) to allow for expansion or redevelopment of the King's School.
2. **Jobs** - provision of up to 3 hectares of additional employment land;
3. **Town Centre** - enhancement of the environment and the promotion of business opportunities.
4. **Social and Community Facilities** - new and enhanced community facilities to serve the town, to include new library provision;
5. **Infrastructure** - better management of road space in the town centre to alleviate congestion.

In addition to a strategic allocation for 350 homes provision will also be in future work for an additional 50 houses elsewhere in the town.

## **Rejected Options**

12.8 The following options for development at Ottery St Mary have been rejected:

1. **Development without supporting infrastructure** - consultation responses highlighted the fact there are limitations on social and community infrastructure provision. It would be inappropriate to not seek to secure extra facilities for the town.
2. **Smaller scale development** – additional housing development through a strategic allocation is proposed when compared to the Preferred Approach. This recognises the proximity of Ottery St. Mary's to the West End, potential for expanding high quality West End public transport links, current retail expansion and the local desire to improve the King's School.



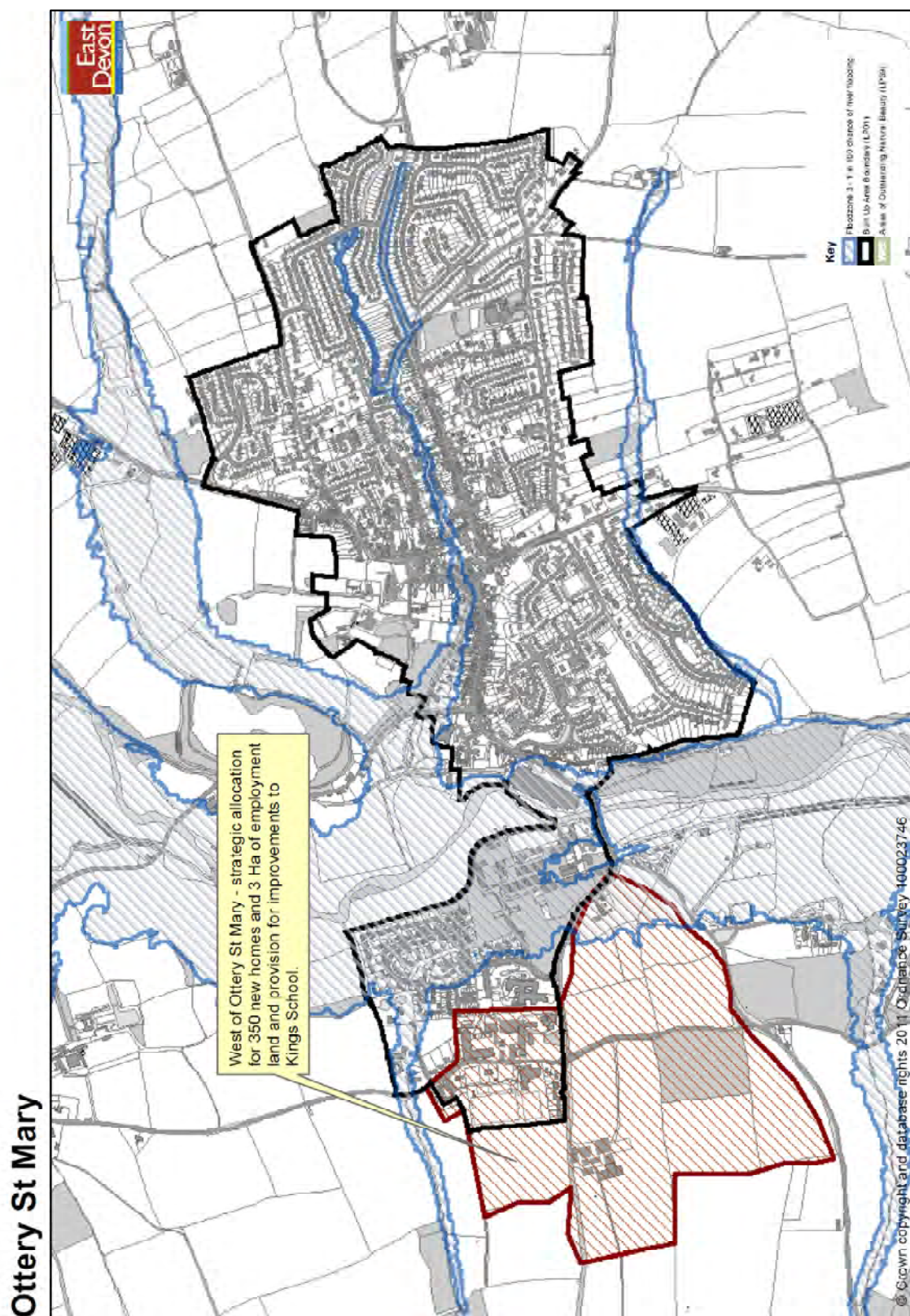
### **How we reached this Policy Position**

The Preferred Approach envisaged about 250 dwellings for Ottery St Mary apart from current commitments, which received mixed responses from the consultation. The Town Council considered the figure too high and did not take into account the proposed development in the Western area of the District. It considered that deferring identifying allocations 'creates delay, uncertainty and concern for residents'. Public meetings in the parish expressed the view that infrastructure to service developments should be major determinants of planning decisions, e.g. South West Water should upgrade their sewage facilities at Fluxton and Ottery St Mary as soon as possible – they are at capacity, which is a barrier to development. Also the over-capacity King's School needs to have a new site identified now.

Nevertheless, Ottery St Mary has excellent road links to the West and improving the School's situation could be assisted by residential development, and perhaps other associated uses: hence the suggested allocation at and around the school site. Whilst some representations made the point that there is allocated employment land adjoining the Finnimore Industrial Estate, it has not come forward for development, so 3 hectares of employment land is still to be identified.

**TO MAKE COMMENTS ON CHAPTER 12:  
OTTERY ST MARY visit:  
[www.eastdevon.gov.uk/draftlocalplan12](http://www.eastdevon.gov.uk/draftlocalplan12)**

## Ottery St Mary



## 13 Seaton

### The Future for Seaton

13.1 Our summary vision and strategy for Seaton is one of:

Placing emphasis on securing regeneration area development with additional employment provision in the town. Longer term growth of tourism, especially green tourism, is a fundamental objective to be promoted and we will seek to enhance the social and community facilities of the town. The Axe wetlands, Jurassic coast and surrounding exceptional coastline will be key environmental assets that will be integral to the future success of the town.

13.2 Feedback and evidence is set out below:

#### **What you said about the future for Seaton:**

- Significant housing expansion not supported by most people.
- Any housing should be mixed to include affordable, family and sheltered for local people, *not* retirement incomers and second homes.
- Community Land Trusts could provide housing.
- There is potential to increase housing density in the town centre by promoting "live over the shop".
- Possible small scale development within or next to the town limits was supported.
- Retain green wedge – no expansion along A3052.
- There was encouragement for employment land and premises – especially starter units.
- Promote "green" tourism, as principal economic driver - support for the wetlands project, promotion of Jurassic Coast World Heritage Site, upgrading, including pedestrian schemes, of the seafront and improving facilities for water traffic and sports.
- Conserve and enhance access to natural environment outside settlement.
- Increase provision and range of overnight accommodation.
- Support the primary school and improve connections to the secondary schools.
- Encourage sustainable transportation options including cycling and walking.
- Support for appropriately scaled and located renewable energy developments.
- Better broadband for business and residential.

#### **What the draft sustainability appraisal, habitat regulations assessment and other evidence tells us:**

- Seaton is highly constrained being surrounded by the AONB, Flood Zone and Coastal Preservation Area. To avoid harm to the natural environment and character of the town housing growth will need to be limited. Development within the existing town footprint may help regenerate the area and maintain the town's vitality and viability (Sustainability Appraisal 2010).
- Eco-tourism, exploiting Seaton's position as a gateway to the Jurassic Coast, could aid the regeneration of the town, but insensitive tourism development that damages the environment could be self-defeating (Sustainability Appraisal 2010).

- House-building on greenfield or brownfield land would be likely to have significant effects on the European protected sites (HRA Screening Report 2010)
- The draft Shoreline Management Plan 2, recommends that in the short, medium and long term (100 years) a policy of "hold the line" is adopted for Seaton Seafront (East of West Walk) and the estuary mouth, while "managed re-alignment" is advocated within the upper estuary. For the cliffs to the West, from Seaton to Seaton Hole, a short term "hold the line" policy would be replaced by a "managed re-alignment" in the medium and long term, in recognition of the primacy of erosive processes in the geological importance of the coastline (World Heritage Site) (Draft SMP2)
- The March 2011 East Devon Strategic Housing Land Availability Assessment indicates that there is a potential supply of about 340 houses in Seaton parish up to 2025, in addition to those committed on the regeneration area and those already with planning permission.

## Seaton Now

- 13.3 Seaton is a modestly-sized coastal town with a population around 7,000 people. Almost 38% of the population in 2001 was aged 65 or over, (compared to the average for England and Wales of 17.3%). 34% of the population were in employment, with most working outside the town, mainly travelling by car. However, a significant proportion (one third) of those with jobs either worked at home or got to their work places without using a car or public transport. Over the 1995 to 2009 period 524 net new dwellings were built in the town, an average of 37.43 per year.
- 13.4 Seaton's two main functions are therefore, as a residential base, popular with retired people and commuters, and as a traditional seaside resort. In the last 10 years, Seaton has been affected heavily by the closure of the Lyme Bay Holiday Park. Many jobs within the town are relatively low paid and/or seasonal, notably in the tourist and care industries.
- 13.5 The level of commercial services for the resident population, now that the new Tesco supermarket has opened, is seen as appropriate to discourage travel to other towns<sup>28</sup>. However, community facilities, school, health, social and cultural, are seen as borderline or inadequate with no capacity to serve additional residents.
- 13.6 The town is located within a stunning natural environment with international and national recognition of its geological, wildlife habitat and landscape quality value (World Heritage Site, three European Special Areas of Conservation, East Devon Area of Outstanding Natural Beauty) and numerous local wildlife designations. The Council's work on the Axe Wetlands Project has over recent years had huge impact, raising the biodiversity value, and the public's understanding and appreciation of this special area. The Axe Estuary and much of the bordering parts of the town, together with the whole of the seafront are vulnerable to flooding from the river and from the sea. The built heritage of the town is also recognised in the designation of a Conservation Area covering most of the town centre with 28 individual properties being listed as of national architectural or historic interest.

<sup>28</sup> GVA (2011) "East Devon Retail Study – Update 2011"



- 13.7 The East Devon Local Plan promotes the regeneration of a large area of the South-Eastern part of the town and the Council has approved or has stated an intention to approve planning permissions for housing (about 350 units) employment, leisure and retail development on the land, all of which will be effected only with major land-raising operations to mitigate flood risk.

### **Seaton: The Future**

- 13.8 We will enhance Seaton's role as an attractive place to live, work and visit by:
- Encouraging the timely and careful roll-out of the regeneration projects already in the pipeline.
  - Ensuring the conservation and enhancement of the world-class natural environment, understanding of its value, and non-damaging access to it.
  - Supporting and promoting the town as a focus for "green" tourism and study with sustainable transportation links and a range of accommodation, interpretation and education facilities that fit this special landscape.
  - Enhancing the traditional seaside heritage and waterborne activity of the town by improvements to the sea wall, esplanade, harbour and beach front to make the most of the commercial, leisure and cultural opportunities presented by the town's coastal position.
  - Restricting any further significant housing developments beyond the existing Built-up Area boundary unless suitable sites for 150 additional homes cannot be delivered within the existing town.
  - Protecting existing and allocated employment land from being lost to other uses
  - Encouraging the provision of high speed broadband to the settlement, and requiring a threshold service/speed level to serve all new development.
  - Managing development carefully to comply with the coastal policies of this plan.
  - Ensure that the integrity of the European wildlife and habitats sites adjoining and near the town are not compromised.
  - Extending the network of green links within the settlement and to surrounding countryside and settlements. In particular we will promote the Sustrans' Cycle Route.
  - Finding positive solutions to ensure that necessary traffic (for tourist and commercial activity, and for the major construction works planned for the regeneration area within the town) causes minimal damage to the quality, character and appearance of the area.
  - Exploring the use of renewable energy sources to help mitigate the effects of climate change.
- 13.9 The preferred approach for Seaton will be to support its role as an important visitor destination on the East Devon Coast, with the onus placed on conservation and enhancement of the surrounding natural environment.<sup>29</sup> <sup>30</sup>There will be limited housing development in the short term beyond that already proposed in the regeneration area.

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<sup>29</sup> Seaton Town Council (2009) "Seaton Town Design Statement"

<sup>30</sup> Seaton Town Council (2004) "Seaton Town Strategy"

## **Consultation Local Plan – Draft Strategy 20**

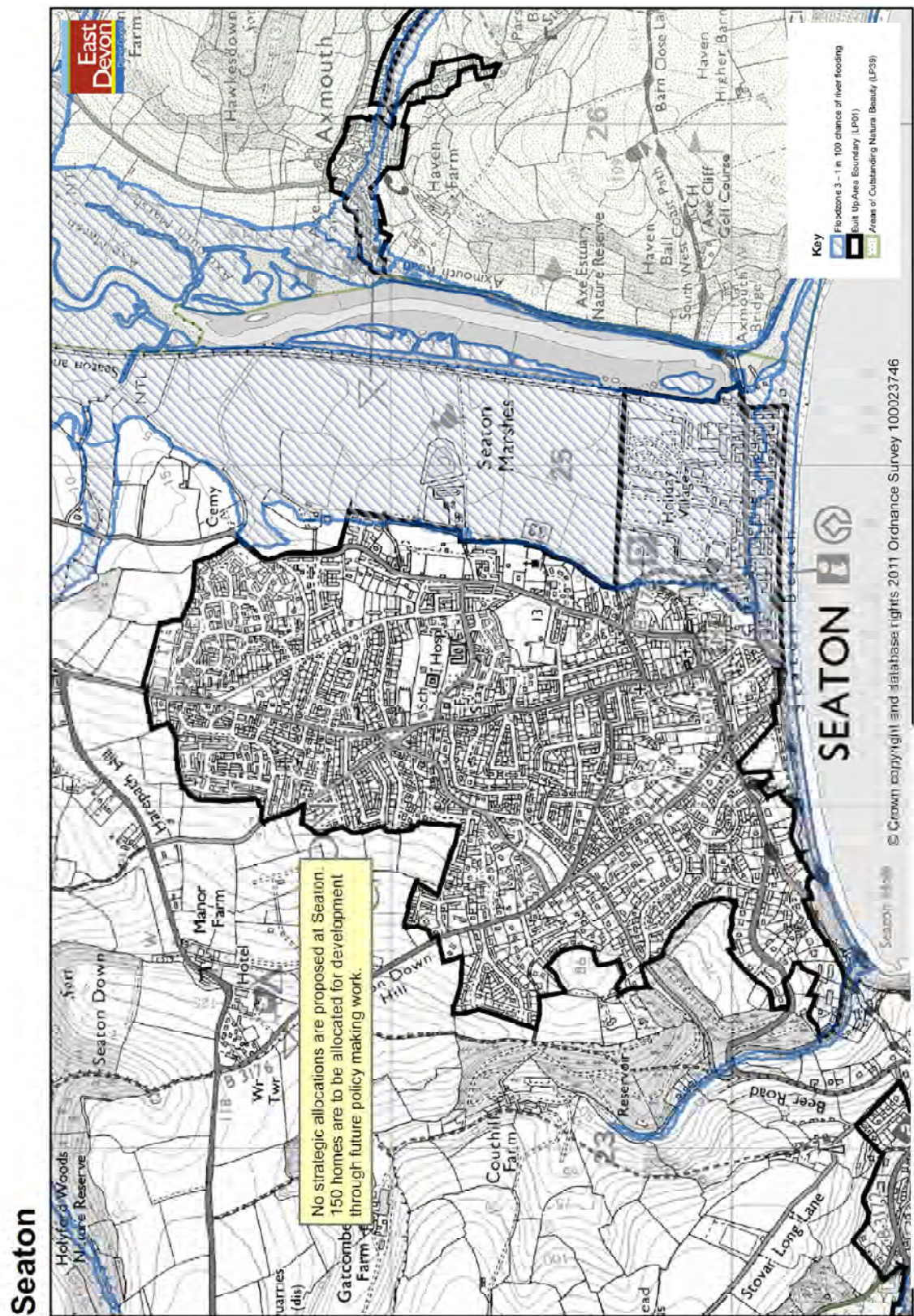
### **Development at Seaton:**

Working with our partners in Seaton, over the 2011 to 2026 period we will promote Seaton's role as an important "green" tourist destination on the Jurassic Coast, secure completion of the Regeneration Area and plan for modest longer term growth, including:

1. **New Homes** - The building of homes within existing commitments for the regeneration area and other parts of the town will be encouraged, and through future plans we will provide for a further 150 dwellings. To be accommodated where possible within existing Built-up Area Boundaries.
2. **Jobs** - Existing and allocated employment sites will be protected from change of use, and a further 3 hectares of land will be allocated in future planning work. In particular, Harepath Road will form the focus for current and future job opportunities in Seaton. Improvements to broadband provision, and to public transport for commuters will be sought to help to provide, retain and make more sustainable job opportunities for the town. Green, educative and watersport themes for tourism will be promoted, by the development of sustainable transport routes, including the Sustrans' Cycle Route learning facilities and a range of new holiday accommodation.
3. **Town Centre** - The enhancement of the existing fabric and character of the town, including design improvements and expansion of commercial opportunities in waterfront areas (sea wall and esplanade and harbour and estuary) will underpin Seaton's developing role as a year-round holiday destination.
4. **Social and Community Facilities and sport and recreation provision** – Improvements to community and recreational facilities, particularly for young people will be required to match new homes commitments. Public and non-car transport links will be improved within and to and from the town, especially where supportive of sustainable tourism.
5. **Environment** - Seaton's outstanding natural environment is its most precious and defining asset, and policies for the conservation, enhancement and sensitive management of the landscape, heritage and wildlife of the area will be prominent.



Seaton



## Rejected Options

13.10 The following options for development at Seaton have been rejected:

1. **Large scale development** - large scale development received limited support through consultation and could be damaging to the natural environment and landscape setting of the town.
2. **Strategic Land Allocations in the Local Plan** - None would be appropriate in advance of the regeneration area scheme coming forward.
3. **Development without supporting infrastructure** - consultation responses highlighted the fact there are limitations on existing social and community infrastructure. So, new development must include the necessary facilities to ensure a balanced and thriving place.

### How we reached this Policy Position

The Preferred Approach for Seaton was to secure the development of the regeneration area with additional employment provision, particularly through tourism growth based on the Axe wetlands, Jurassic Coast and outstanding coastline.

General responses to the Preferred Approach supported the emphasis on conserving the environmental assets of Seaton and promoting tourism. It was felt that to add a further 250 homes to those already permitted for Seaton the boundary of the town would have to be breached and this was not supported. Respondents valued the town centre and wanted to see more done to promote commercial activity and make it more vibrant.

Seaton Town Council broadly supported the Preferred Approach for Seaton. The main exception was to the part of Draft CS 18 that looked to review the potential for larger scale strategic growth in the longer term. The Council did not support extending the current Built-up Area Boundary on the basis that an increased housing allocation would be detrimental to existing infrastructure and create an imbalance between the number of homes and jobs. The number of additional houses proposed in Seaton has been reduced from 250 to 150 and the reference to strategic growth in the longer term removed.

In terms of employment the Town Council wished to see sites within the regeneration area, at Seaton Quay and Seaton Heights protected for tourist uses and the existing employment allocation at LSE2 retained for employment. This approach is broadly in line with the Preferred Approach.

**TO MAKE COMMENTS ON CHAPTER 13:  
SEATON visit:  
[www.eastdevon.gov.uk/draftlocalplan13](http://www.eastdevon.gov.uk/draftlocalplan13)**

## 14 Sidmouth

### The Future for Sidmouth

14.1 Our summary vision and strategy for Sidmouth is one of:

Seeking to accommodate modest employment and limited housing growth to meet locally generated needs with the objective of retaining and consolidating the existing qualities and character of the town. The Regency grandeur of Sidmouth will be conserved and enhanced with sensitive redevelopment adding to the commercial vibrancy of the town. Park and ride provision will offer potential for management of traffic in the town. Provision will be made for an improved employment site or sites although it may be necessary for provision to be located outside of the existing built up area boundary if no alternative sites are available within the town.

14.2 Feedback and evidence is set out below:

#### **What you said about the future of Sidmouth:**

- Many people felt that the character of the town could be severely damaged by any significant new development.
- Support for modest or lower levels of housing and employment development.
- It was widely considered that there is a need for more affordable housing for local people.
- Development within the built fabric of the town and to the North of Woolbrook were more favoured than other options or alternatives.
- The main Alexandria Road industrial site is considered to have bad access and there are conflicts with nearby housing.
- More flats above shops, especially in the town centre, were promoted.
- It was considered that the town's age profile and relative lack of employment opportunities (except in the lower paid service sector) require more and better jobs to be attracted to the town.
- It was felt that there is a shortage of employees available to work in elderly people's sheltered accommodation.
- "Park and Ride" was promoted for the town as were suggestions of town centre pedestrian schemes and further traffic management. However, concerns were expressed that restricting cars might discourage tourists.
- Cycle and footpath links were suggested, including to Sidbury (footpath) and to Ottery St Mary (cycleway).
- It was suggested that more facilities are needed for younger people, and better school transport.

#### **What the sustainability appraisal and evidence tells us about the future of Sidmouth:**

- Any significant levels of development in the town would require an Appropriate Assessment to be carried out (Screening Report, Habitat Regulations Assessment 2010).



- New building on greenfield sites adjoining Sidmouth could assist the viability of the town and increase leisure and decent home provision, but this could be at a cost to the surrounding environment (landscape, biodiversity and air/soil/water quality). Brownfield development could be supportive of community services and sustainable transport, in addition to having flood risk and town viability benefits (Sustainability Assessment 2010).
- The draft Shoreline Management Plan 2, recommends that in the short, medium and long term (100 years) a policy of "hold the line" is adopted for Sidmouth seafront West of the River Sid to the Chit Rocks. For the River Sid and East Sidmouth the Shoreline Management Plan 2 recommends "managed realignment" through beach management from the present day through to the long term.
- The March 2011 East Devon Strategic Housing Land Availability Assessment indicates that there is a potential supply of land for around 282 homes within the Parish of Sidmouth, in addition to those with planning permission not yet built.

## Sidmouth Now

- 14.3 Sidmouth originated as a small coastal fishing community and developed into a fashionable resort. Today it is nationally renowned as a Regency seaside town of exceptional charm, character and architectural value. The architectural and historic qualities justify large parts of the town being designated as Conservation Areas. The Esplanade and sea front areas are amongst the most attractive parts of the town and help to define its special charm and character. As well as its built heritage the town is notable for its exceptional environmental qualities. Attractive hilly and mixed arable and wooded countryside falling in the East Devon Area of Outstanding Natural Beauty abuts the Eastern, Southern and Western sides of the town. The Byes is an important open parkland area that runs through the town alongside the River Sid down to the sea.
- 14.4 The Parish of Sidmouth has a population of around 13,800 residents most of whom live in the town. The population is swelled by a year round tourist population that peaks during the annual Sidmouth Festival in August. The town has an elderly population profile and is a very popular retirement destination but it does also have all round family appeal. Sidmouth supports a very wide range of facilities and is a commercially vibrant town with many independent and successful shops, bars and cafés. The town centre acts as a focal point for residents and visitors alike and also for people for surrounding areas and those employed in the town.
- 14.5 We will conserve and enhance the overall quality and appeal of Sidmouth by:
- Meeting Sidmouth's housing needs through redevelopment opportunities within the town to accommodate 150 homes.
  - Promoting opportunities for further development of high quality tourism in Sidmouth especially in respect of shoulder seasons and out of season visitor appeal.
  - Improving sporting, cultural and community facilities to serve Sidmouth and the surrounding rural area by seeking new facilities or enhancements to existing facilities in parallel with other developments.

- Promote a mixed use redevelopment of the East End and Drill Hall site on the Esplanade.
- Promote an upgrading of or new access into the Alexandria Industrial Estate and/or a new employment site on the Northern edge of Sidmouth. Employment provision will help promote the commercial vitality of the town.
- Conserving and enhancing the built environment and historic qualities of Sidmouth, especially in the town centre and Seafront and continue to promote these as assets for visitors to the town and key resources for residents.
- Conserving and enhancing the special qualities of the Byes and promote footpath and pedestrian links. We will promote opportunities for sensitively planned, located and improved recreation provision.
- Working with partners we will seek to reduce the adverse impacts of traffic on the town centre, opening up potential for further pedestrianisation and promoting access into the town through “park and ride” (and park and change) proposals.

### **Consultation Local Plan – Draft Strategy 21**

#### **Development at Sidmouth:**

The preferred approach for Sidmouth will see limited housing development within the existing built-up area boundary. Commercial development will be focused on complementing the high quality of the town and its importance as a year round tourism destination. Job opportunities will also be provided through the allocation of additional employment land. Working with our partners in Sidmouth, over the 2011 to 2026 period, we will specifically plan for and promote:

1. **New Homes** - an additional 150 new homes to be provided on sites within the existing Built-up Area boundary, unless it is demonstrated that there are insufficient deliverable sites to accommodate this scale of housing growth in the plan period'
2. **Jobs** - provision of up to 5 hectares of additional employment land, with a particular onus on B1 space with uses and development compatible with the regency qualities and current uses and nature of the town,
3. **Town Centre** - enhancement of the environment and promotion of business opportunities in the town centre,
4. **Social and Community Facilities** - facilities to match future development and new housing,
5. **Infrastructure** - better management of road space in the town centre to alleviate congestion, and “park and ride” (and park and change) provision.

### **Rejected Options for Sidmouth**

14.6 The preferred approach for Sidmouth was favoured over the following alternatives:

1. **Larger scale development** - consultation feedback has indicated minimal support for larger scale growth in Sidmouth and the town is very constrained by sensitive environmental designations, particularly Area of Outstanding Natural Beauty designations, constraining development potential.
2. **Not recognising/not placing an emphasis on conservation** - among the most appealing facets of Sidmouth are the quality of its built environment and the natural setting of the town. To not recognise the appeal and importance of these factors would undermine the overall worth and quality of Sidmouth.

### **How we reached this Policy Position**

The Preferred Approach for Sidmouth was to accommodate modest housing and employment growth whilst consolidating the existing qualities and character of the town.

Responses to the Preferred Approach emphasised the environmental qualities of Sidmouth and it was felt that any additional housing should be accommodated within the town. There have been a large number of planning permissions for housing in Sidmouth since 2006. In view of the number of homes already built and likely to be built and the environmental constraints of the town, surrounded by an Area of Outstanding Natural Beauty and the Coastal Preservation Area, it is reasonable to reduce the number of new dwellings proposed in Sidmouth to 150. It is likely that this number can be planned for within the existing Built-up Area Boundary through redevelopment opportunities. Only if deliverable sites for these homes could not be identified within the existing town would consideration be given to extending the Built-up Area Boundary to accommodate additional housing.

Sidmouth Town Council wished to see current policies on the drill hall site, the Alexandria Road industrial site and protection of the seafront and the Byes are retained. They sought a new employment site to the North of the town and listed other priorities as tourism, improved infrastructure and not developing in the Coastal Preservation Area. The proposal for 5 hectares of industrial land is retained although this may need to be located outside of the existing Built-up Area Boundary if a suitable site can be identified.

The updated retail study for East Devon<sup>31</sup> has found Sidmouth town centre to be popular and healthy with good retention rates for both food and non food shopping. The Preferred Approach of enhancing the town centre environment and promoting business opportunities should be retained.

**TO MAKE COMMENTS ON CHAPTER 14:  
SIDMOUTH visit:**

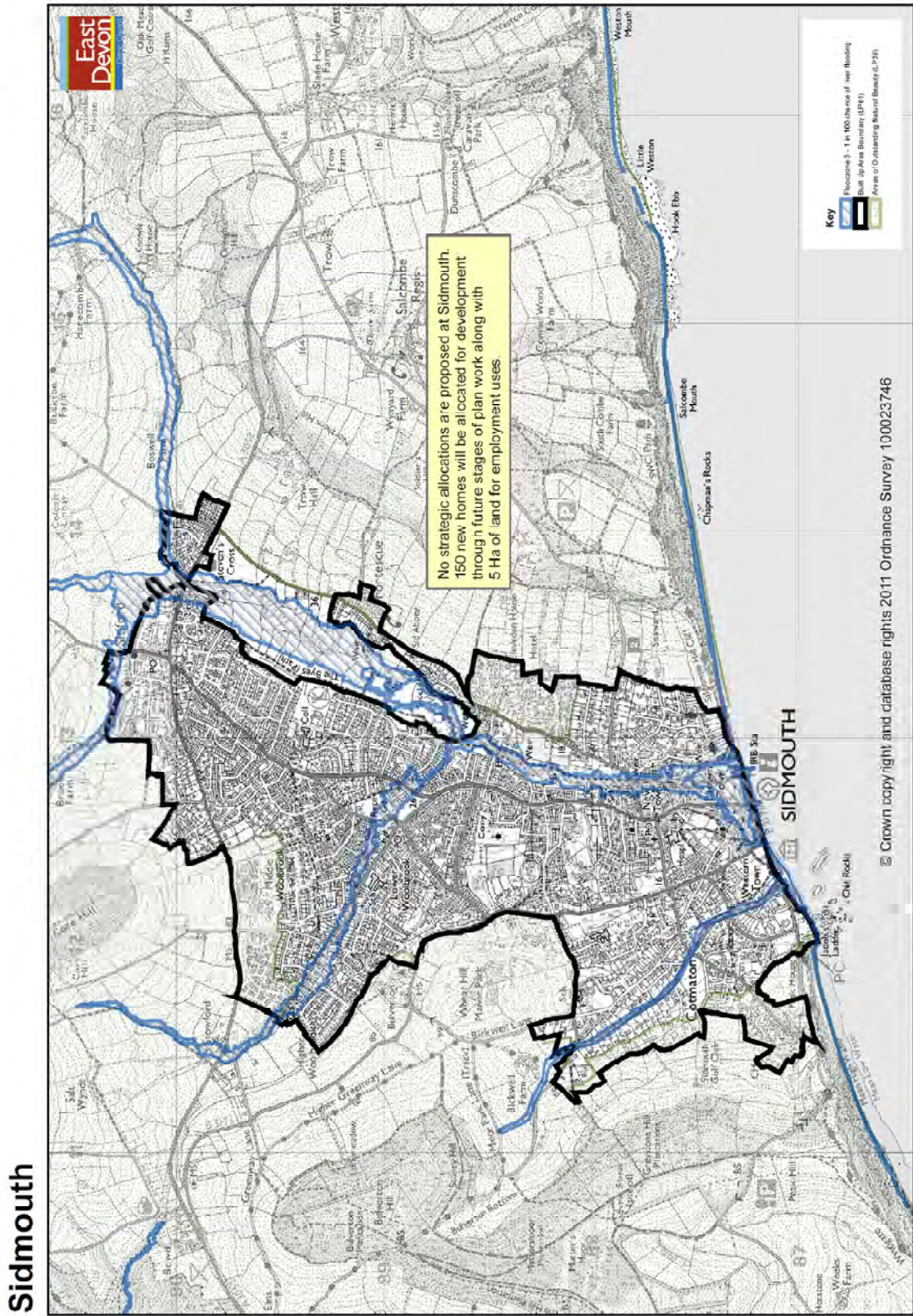
**[www.eastdevon.gov.uk/draftlocalplan14](http://www.eastdevon.gov.uk/draftlocalplan14)**

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<sup>31</sup>GVA (2011) “East Devon Retail Study – Update 2011”



Sidmouth





## 15 Smaller Towns, Villages and Countryside

### Ensuring Vibrant Rural Areas

15.1 In our smaller towns, villages, hamlets and the rural areas of East Devon we aim to secure a vibrant and dynamic future with an emphasis on community led development to meet local needs.

15.2 Feedback and evidence is set out below:

#### **What you told us about Smaller Towns, Villages and the Countryside:**

- Most rural residents rely on the District's main towns and larger urban centres to meet their main retail, cultural, medical and secondary and higher education needs. Rural residents said they like to use their local village facilities for local shopping, social activity and primary schooling.
- The majority of rural residents commute to work, many to East Devon towns and Exeter.
- Poor public transport provision makes it difficult to live in rural areas without a car.
- There is a shortage of affordable housing, both to rent and buy, and a shortage of sheltered and special needs housing to enable rural residents to remain in their local area.
- Smaller dwellings, of 1-3 bedrooms, are in most demand to meet local needs
- There is a shortage of small business premises, for storage and working in or the expansion of existing small rural businesses
- Investment in training and information technology. Broadband access is needed.
- The countryside should be conserved and enhanced but some development should be allowed to improve vitality and meet the needs of local residents
- Many local communities are already actively involved in planning issues to ensure that their needs are appropriately met.

#### **What the sustainability appraisal and evidence tells us about Smaller Towns, Villages and the Countryside:**

- Basing the scale of development on the level of services, accessibility and the ability of settlements to meet the daily needs of residents accords with the sustainability appraisal and addresses the concerns raised during the consultation.
- The April 2010 Strategic Housing Land Availability Assessment indicates that there is a good supply of potentially developable land to meet housing need in the more rural settlements up to 2025.
- In settlements with a well established and locally supported need for affordable housing, a proactive approach to identifying suitable sites, in addition to appropriate use of a rural exceptions policy, may be needed to ensure these needs are met.
- Whilst the distance to amenities, services and employment sites should be minimised, particular circumstances of the service or proposed location may mean that sustainability impacts are not as negative as may be expected.



### **How we reached this Policy position:**

Outside the main towns and West End, the hierarchy suggested in the previous Preferred Approach centred on the designation of 16 larger settlements as ‘hubs’ capable of accommodating 50 dwellings each, a number of smaller villages with ‘Built-up Area Boundaries’ which could accommodate 20 dwellings and the remainder as countryside within which only very limited affordable housing to meet local needs would be permitted. The status of each settlement was dependent upon the size, scale of facilities and services and accessibility by public transport. This approach was based on extensive consultation and a questionnaire to all Parish Councils.

The policy attracted criticism as it did not differentiate between hub settlements or recognise their diversity, with some smaller hubs feeling overwhelmed by 50 houses. The majority of villages to which 20 houses were allocated did not object, although some wanted additional development to deliver projects. Most ‘countryside’ areas were satisfied although several small villages expressed concern that they would not be able to deliver any housing.

The new approach is based around allocating housing numbers as a proportion of existing dwellings within the Built-up Area Boundary of each settlement. A 5% figure for future allocations is used as a basis, when taken alongside a similar percentage increase through windfall sites<sup>32</sup>, to maintain existing population numbers and address falling household sizes. Where communities would like additional housing they can propose this through a Neighbourhood Plan.

In accordance with the Policy on Mixed Market and Affordable Housing outside Built-up Area Boundaries, small developments will be permitted in the smaller settlements without Boundaries where a local need has been identified/ through a Neighbourhood Plan.

15.3 We are keen to ensure that new development in the smaller towns, villages and the countryside of East Devon will contribute towards making places vibrant without overwhelming areas with excessive new development. To this end the primary focus for rural development will be on maintaining population numbers, which are naturally declining due to the ageing population and smaller household sizes, meeting local needs and supporting the facilities and services available in rural areas whilst safeguarding, and where possible enhancing, the natural and built environment.

- Outside the main towns a moderate level of growth will be focused in the smaller towns and larger villages, particularly where this meets local needs, for affordable housing, new jobs or sheltered homes. Suitability of places for growth and the scale and nature of that growth should be determined on the basis of a range of social, environmental and economic issues and should be informed by detailed local needs studies and village or parish plans.

<sup>32</sup> See South West of England RDA Research Paper (January 2008) “Why So Many Houses”. Data in this paper indicates that, from a South West region perspective, around a 13.4% increase in dwelling stock would maintain a stable population over the 2002 to 2026 period. Over the 15 years from 2011 to 2026 this points to a 8.4% increase. A planned 5% provision with a small additional allowance for windfalls would provide this approximate scale of development.

- In smaller villages without Built-up Area Boundaries, housing development will be permitted in accordance with the Policy on Mixed Market and Affordable Housing outside Built-up Area Boundaries but should primarily be limited to meeting rural needs.
- Housing development should be balanced by the provision of jobs particularly those offering skilled positions. Technology based industry with a low environmental impact will be particularly encouraged.
- The character of the countryside should be conserved and enhanced and new development should not detract from this.
- Away from villages, farm and rural business diversification should take the form of small scale rural enterprises, re-use of existing buildings and for uses that add value to current farming enterprises. This would safeguard the food supply whilst providing financial support to farmers.

15.4 This reflects Government Guidance. The response to consultation and concerns in the Taylor Review of the Rural Economy and Affordable Housing that restrictive planning practises and shortfalls in affordable homes are contributing to many villages and hamlets becoming 'unsustainable' communities.

### **Jobs in Rural Areas**

15.5 Many rural villages act, to some extent at least, as dormitory commuter villages with residents working in nearby towns and cities<sup>33</sup>. Whilst this can be positive in terms of providing a high quality living environment for residents it may do little to support commercial viability and enterprise in villages. Also, commuters will often drive longer distances to jobs. Public transport in most villages is poor adding to road congestion and increased carbon emissions. In response to this, the Council is keen to promote employment opportunities in rural areas. This is seen as a way to help to maintain and enhance village vitality and meet local needs whilst also providing an alternative to a reliance on commuting out for work purposes. New employment should be provided in conjunction with new housing provision. We are keen to see skilled jobs, and higher paid jobs, particularly in areas such as technology and home-working.

### **Housing**

15.6 House prices across East Devon are high but in many rural areas they are particularly expensive.<sup>34</sup> This puts home ownership well beyond the 'affordability' of a lot of rural residents and families. The Council are keen to find innovative ways to meeting the need for affordable housing for rural areas and a key thrust of future policy will be towards local needs provision.

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<sup>33</sup> See Roger Tym and Partners – East Devon Housing and Employment Study (on the Evidence Pages of the Council Website – for further details of Travel to Work Patterns).

<sup>34</sup> See Roger Tym and Partners- East Devon Housing and Employment Study (on the Evidence Pages of the Council Website- for further details of average house prices).

- 15.7 Provision of affordable housing will be subject to conditions requiring that it remains affordable in perpetuity. We will explore mechanisms for allocating affordable housing to those households with a local connection.
- 15.8 Consultation<sup>35</sup> has highlighted a need for houses to suit residents throughout their lives and, whilst affordable housing may help young people to remain in their villages. Those with special needs and older residents may require assistance and adapted accommodation if they are to continue living locally. Provision of sheltered accommodation will help to meet this need, may provide some local care work and will enable older residents to downsize freeing up their existing homes for families.
- 15.9 It is recognised that some open market housing can also be appropriate in rural areas, particularly if it will contribute towards affordable housing and will help to maintain a balanced population in terms of age and skills whilst helping to sustain some rural facilities.

### **Social and Community Facilities**

- 15.10 A key aspect of village and rural life is the close community bond that can be established through well used and maintained facilities but falling population numbers can threaten their viability. Village halls, pubs, shops and Post Offices all add to the quality of rural life and the Council is keen to see their retention in the future and where possible additional new provision. Many rural communities across East Devon benefit from high quality halls and other community owned spaces which in many cases are full or even over-subscribed. Commercial facilities, including pubs and shops, are sometime less successful and over recent years there has been a pattern, mirroring national trends, of facilities closing down. Increased population levels in villages and hence extra customers, as might be secured through additional housing, can play some part in sustaining village facilities, but the success of rural facilities also rests on the quality of the business and on community endorsement. Flexibility in the way in which commercial and community facilities operate may help to increase trade, for instance by sharing premises between the pub and Post Office or shop, or using a Place of Worship as a pre-school. The Council will resist the loss of facilities and aim to work with owners, operators and communities to provide, retain and improve facilities.
- 15.11 Extra affordable housing, because it will often house younger people and families, can play a particular role in helping sustain school numbers and thereby maintain village schools. It can also help to increase the presence of younger people in villages where often the age profile is increasingly aged.<sup>36</sup>
- 15.12 Additional retail, social and community facilities will be supported at all villages and contributions towards retention and/or provision will be sought from new development. Loss of existing facilities will be resisted.

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<sup>35</sup> See East Devon District Council- Outcome of the Preferred Approach Consultation- Spring 2011 (several docs) (on the Evidence Pages of the Council Website- for further details of the consultation which informed the Core Strategy Preferred Approach and the Revised Local Plan Autumn 2011).

<sup>36</sup> EDDC (2011) "School Consultation Events Report"



## **Infrastructure**

- 15.13 The infrastructure serving villages is often poor in comparison with towns and urban areas. Unless villages lie on a through route they will typically have poor public transport and many villages lack mains gas supply and other services. Broadband and electronic communications in villages and rural areas are often very poor, in terms of capacity and coverage, and this has been highlighted as a particular constraint on business start up and expansion. It will always be a challenge to secure public transport services for the remoter villages. For those without access to a car, or who are not able to walk or cycle longer distances, often including the young, elderly, disabled and parents with children, non-car based transport can be essential. Enhancing and supporting services and facilities which are able to meet the daily needs of residents will reduce the need to travel whilst increased communications and regular public transport service will reduce the social isolation often felt by the more vulnerable members of the community.
- 15.14 The Council recognise the need to promote and encourage public transport provision whilst also encouraging community transport services and links. There is also scope for mobile services, such as Doctors and grocers, to visit rural residents without transport. This will be encouraged but, due to the dispersed nature of rural residents, may not prove financially viable.

## **The Small Towns and Villages of East Devon**

- 15.15 There are a number of smaller towns and larger villages in East Devon that provide a range of facilities and services, and many have regular public transport services<sup>37</sup>. These settlements provide for some of the basic needs of their resident populations as well as for the needs of nearby rural areas and smaller villages. These settlements are identified by their Built-up Area Boundaries and are listed below. All have been consulted regularly as to their aspirations for growth and the results of three questionnaires, in Spring 2010, Autumn 2010 and Spring 2011, informed the Local Plan<sup>38</sup>. The preferred approach for these smaller towns and larger villages will be for growth at a rate of 5% (based on the number of houses within the Built-up Area Boundary of each settlement as at 31<sup>st</sup> March 2011) over the Plan period. This is intended to maintain existing population levels<sup>39</sup> and is geared around meeting local needs and creating vital, socially balanced communities without overwhelming their existing character. In some cases Parish Councils have justified alternative figures where, for instance, additional housing is needed to deliver a particular project or environmental constraints are such that extension of the Built-up Area Boundaries would cause unacceptable harm.

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<sup>37</sup> EDDC (2009) "Facilities Checklist"

<sup>38</sup> EDDC (2010-2011) "Parish Questionnaire results"

<sup>39</sup> See Roger Tym and Partners – East Devon Housing and Employment Study (on the Evidence Pages of the Council Website – for further details of Population numbers and decreasing household size).

- 15.16 In the smaller villages with Built-up Area Boundaries the 5% growth rate is aimed at meeting the needs of local residents, with a strong emphasis on the achievement of affordable and sheltered housing and providing employment close to residents' homes. These villages are unlikely to meet residents' daily requirements but improvements to the range of services and facilities which they offer will be encouraged.
- 15.17 In future, some settlements with Built-up Area Boundaries may wish to increase the level of development further to help deliver facilities or provide housing to meet a specific need. This will be acceptable provided it is supported by a Neighbourhood Plan demonstrating that the local community is supportive.
- 15.18 This approach will reflect the Government's agenda which aims to give neighbourhoods far more ability to determine the shape of the places in which their inhabitants live and help communities save local facilities and services threatened with closure, including taking over some local services. These settlements will not typically directly compete with the far greater range of goods and services available in the main towns. Instead they will meet residents' basic daily needs, reducing the need to travel and reducing the social isolation and deprivation of those who can't easily get around. Social isolation is a recognised problem for rural residents particularly the elderly, ill and those on low incomes and lack of transport increases this as well as making it difficult to attend medical appointments, employment and education which are essential requirements of everyday life. Concentrating new housing in areas without public transport or facilities will exacerbate the problem. The countryside settings of these settlements, many of them in Areas of Outstanding Natural Beauty, will need to be carefully conserved and enhanced.

**Consultation Local Plan – Draft Strategy 22****Development at the Small Towns and villages with Built-up Area Boundaries:**

The Preferred Approach will see Built-Up Area Boundaries and the following house numbers assigned to these settlements:

Awliscombe	20	Aylesbeare	50
Axmouth	10	Beer	40
Bramford Speke	5	Branscombe	5
Broadclyst	30	Broadhembury	5
Chardstock	10	Clyst Hydon	5
Clyst St George	25	Clyst St Mary	90
Colaton Raleigh	5	Colyford	10
Colyton	35	Dunkeswell	35
East Budleigh	15	Ebford	25
Feniton	35	Hawkchurch	5
Kilminster	15	Lympstone	40
Membury	5	Musbury	10
Newton Poppleford	40	Offwell	5
Otterton	15	Payhembury	5
Plymtree	15	Rockbeare	10
Sidbury	15	Smallridge	5
Stockland	5	Talaton	5
Tipton St John	10	Uplyme	20
Upottery	5	West Hill	35
Whimble	20	Woodbury	35
Woodbury Salterton	5		

These settlements are very different in their size and character but all offer a range of accessible services and facilities to meet the everyday needs of local residents and the surrounding area. All the settlements with Built-up Area Boundaries are served to some extent by public transport, with some villages offering frequent train and/or bus services but Aylesbeare, Chardstock, Clyst Hydon, Dalwood, Hawkechurch, Membury, Payhembury, Plymtree, Smallridge and Stockland are served on a less than daily basis and more frequent provision will be encouraged.

It is envisaged that, unless a higher figure has been established with the local community<sup>40</sup>, each village will accommodate growth at a rate of 5% rounded to the nearest 5 dwellings (based on the number of houses within the Built-up Area Boundary of each settlement as at 31<sup>st</sup> March 2011) over the Plan period, along with associated employment provision.

**Homes:** New homes will integrate with existing settlements, in accordance with existing Design Statements and where new housing is provided on the edge of settlements it should integrate with new employment and community facilities. Built-up Area Boundaries will need

<sup>40</sup> See Awliscombe Parish Plan, Aylesbeare Parish Plan and Village Design Statement, Beer Village Design Statement, Clyst St George Parish Plan, Bishop's Clyst Parish Plan and Colyton Town Plan. Plymtree will provide evidence shortly.

to be amended through future stages of plan making. Through Neighbourhood Plans dwelling numbers, and employment provision and other land uses/development types, may be increased with local support, to reflect size of settlements, local needs, local aspirations for growth and potential development site characteristics.

**Jobs:** The onus will be on meeting local employment needs and supporting the appropriate expansion of existing businesses. Upgrading and enhancement of existing employment sites and provision of a range of additional employment sites to provide opportunities for local residents to work close to their homes will be encouraged. For every new dwelling the aim will be to provide one new job opportunity. The type of jobs depending on local circumstances. In some areas contributions may be sought towards infrastructure costs, such as high speed broadband, to facilitate homeworking.

**Facilities:** Additional retail, social, community, health and education facilities will be supported at settlements, and will be an integral requirement of new development. Loss of existing facilities will be resisted.

**Infrastructure:** All these settlements are well served by public transport, but more frequent provision will be encouraged. High speed technology and communications links will be encouraged, particularly where they will reduce social isolation or improve employment opportunities.

The Local Plan has previously shown Built-up Area Boundaries for Alfington, Buckerell, Clyst Honiton, Combe Raleigh, Dalwood, Exton, Gittisham, Kerswell, Luppitt, Marsh, Marsh Green, Northleigh, Poltimore, Rawridge, Raymond's Hill, Rewe, Sheldon, Sowton, Stoke Canon, Tytherleigh, Upton Pyne, Whitford, Wiggaton, Wilmington and Yarcombe. The Boundaries were deleted due to a number of factors, primarily lack of facilities to meet resident's basic daily needs and/or landscape/environmental/infrastructure constraints. In accordance with the Policy on Mixed Market and Affordable Housing outside Built-up Area Boundaries small developments will be permitted in these settlements.

## **Affordable Housing in Rural Areas**

15.20 There is a pressing need for affordable housing throughout the District. It is anticipated that this will mainly be provided as a percentage of allocated housing on larger sites however, on smaller sites, where this is impractical, a contribution towards affordable housing will be sought. To help provide for affordable housing, recognising the need to generate money to subsidise provision, mixed affordable/open market schemes will be permitted where they are located adjacent to, but outside, Built-up Area Boundaries. In some instances due to the need to protect an important historic, landscape or nature feature, sites not immediately adjacent but well-related and within easy walking distance will be considered. All sites will need to be close to a range of facilities and meet a proven local need. Such schemes will be required to contribute towards community facilities and infrastructure to the same extent as other market residential development. Up to 15 houses may be built under this policy and the affordable housing must account for at least 66% of all the houses built.

### **Consultation Local Plan – Draft Strategy 23**

#### **Mixed Market and Affordable Housing outside Built-up Area Boundaries:**

Mixed affordable and open market housing schemes for up to 15 dwellings will be allowed in rural settlements where there is a proven local need. Sites will need to be well related to the settlement and close to a range of facilities. Affordable housing must account for at least 66% of the houses built.

### **Rural Housing and the Countryside**

- 15.21 The preferred approach for the remainder of the District is one of development constraint and countryside protection whilst recognising the needs of those who live or work there. There will be scope for small villages without Built-up Area Boundaries to benefit from limited development specifically to meet a proven local need, for instance for affordable housing or local employment but generally these settlements will be expected to look to the larger settlements to provide general housing, employment and facilities. Improvements to rural technology will be strongly supported, particularly where this will facilitate home-working and reduce social isolation. Employment uses will be supported where these can provide jobs for local residents, particularly skilled employment, or aid the expansion of successful small firms.
- 15.22 These locations cannot meet residents' daily requirements but improvements to the range of services and facilities which they offer will be encouraged. The Local Plan will not allocate specific sites for development in the countryside but will consider applications with strong evidence of local need as exceptions to normal planning policy.

### **Agricultural and Other Rural Enterprises**

- 15.23 Over 90% of the land area of East Devon is non-developed rural land, much of outstanding landscape quality. A small element of this is heathland, woodland and open water but the vast majority is farmed and has been for centuries. More than any other human activity, farming has shaped the landscape of East Devon.
- 15.24 Farming and allied trades and businesses remain integral to the present and future of East Devon. Furthermore with an increasing onus on food security, local produce and reducing 'food-miles' it is important to establish policy for a productive countryside. The Council will seek to work with partners to secure a viable agricultural sector and promote development that will help retain and enhance farming, including cases where development, diversification and business activity would add value to agricultural, forestry or other rural practises.
- 15.25 Wherever possible we will encourage the re-use of modern redundant agricultural buildings for agriculture-related activity. Where such buildings are in poor condition, have a substantial negative impact on the landscape or are located in isolated positions their re-use is unlikely to be desirable and, ideally, they should be removed completely. Many buildings, however, will be well suited to alternative business uses,

in terms of size, location, design and condition, offering an opportunity to generate an income for the farm on which they are located and employment for local people without detriment to the surrounding area. In these cases, re-use to provide jobs and accommodate new businesses or existing business expansion will be encouraged.

- 15.26 The Government is keen to re-use appropriate rural buildings to provide affordable homes as part of their 'Homes on the Farm' proposals. This will be feasible where such buildings are within or immediately adjacent to settlements.

**Consultation Local Plan – Draft Strategy 24  
Sustaining and Diversifying Rural Enterprises**

The Preferred Approach is that the Local Plan will provide for developments that will help sustain and diversify agricultural and traditional rural enterprises and add value to rural produce production. The Preferred Approach will also allow for the reuse of rural buildings to provide jobs and accommodate business start ups and expansions.

**TO MAKE COMMENTS ON CHAPTER 15:  
SMALLER TOWNS, VILLAGES AND  
COUNTRYSIDE visit:  
[www.eastdevon.gov.uk/draftlocalplan15](http://www.eastdevon.gov.uk/draftlocalplan15)**



## **16 Ensuring we Have Thriving Communities**

### **Achieving Thriving Communities**

- 16.1 Our communities each have a special character and culture which we must not lose. Elsewhere in this document we have set out the scale and location of future development in East Devon but there are a number of other considerations which are essential if communities are to continue to thrive and residents are to enjoy a high quality of life. If jobs and homes are provided in isolation they will meet some basic objectives, those of providing an income and a place to live but will not contribute positively towards the communities in which they are located and will not fulfil any other needs of their residents. This section seeks to set out the overarching policy requirements which will ensure that new development is successfully integrated into and contributes towards the wellbeing of existing communities whilst meeting the needs and expectations of new residents.
- 16.2 Local communities have the opportunity to influence directly the planning decisions that affect them. In addition to making and commenting upon planning applications, many communities have produced local guidance and position statements in the form of Parish Plans, Design Statements and Local Appraisals which can inform decision making. Housing and employment needs assessments can also help to establish the level of development appropriate to a particular settlement, whilst a facilities and services audit can identify any shortfalls in provision. Provided such documents are representative and have a high degree of community support they can be very valuable in guiding future development and in ensuring that adequate supporting infrastructure is provided. The work that neighbourhoods and people have done in the past and will do in the future will be key to achieving the objectives of 'localism' and local decision-making, which are at the core of the Government's thinking and agenda.
- 16.3 We will consult and engage residents ourselves so that we can understand what is special to them about the places that they live in and the need for further maintenance, control, or development so that local people feel that they can be influential in the way developments are managed. This will avoid losing what is special about individual communities.

### **Jobs and the Economy**

- 16.4 Key objectives for East Devon include seeking to improve job opportunities and business performance. We recognise that large scale inward investment into the District, providing skilled jobs, is most likely to occur in the Western part of East Devon and for this reason we have identified strategic development sites close to the M5 motorway that will appeal to this sector. Elsewhere in East Devon site provision is to be geared around securing development to promote business growth of smaller scale existing and new businesses.

- 16.5 The East Devon Economic policies are designed to ensure:
- a) The delivery of a wide range and type of employment land for potential investors. Care will be taken to avoid over provision where this might inhibit successful market delivery and local wealth and job creation.
  - b) The growth potential of existing local small and medium sized businesses is supported by encouraging the market delivery of suitable and accessible accommodation not only in the District's coastal and market towns, but also in association with rural housing development.
  - c) That local agriculture and land based enterprise is enabled to respond successfully to changing market and environmental conditions and to sustain its pivotal role in the maintenance of the District's outstanding natural landscapes.
  - d) That the District's visitor economy adapts successfully to the changing requirements of holiday makers, leisure, business and other visitors. The renewal and improvement of the District's stock of visitor accommodation will be encouraged as will investment in the maintenance and enhancement of local visitor attractions. Every effort will be made to maintain East Devon's position as a high quality, year round visitor destination.
  - e) That residents and employers have access to skills training and development facilities that reflect their needs and the changing requirements of local businesses.
  - f) Young people have opportunities to secure good jobs, training and education.
- 16.6 The promotion of employment opportunities in East Devon will seek to retain young graduates through development of knowledge based businesses. Currently only 5% of East Devon's economic structure is represented by those employed in knowledge based sectors in comparison to 18% in Exeter and nationally. To secure a better paid more diverse local economy East Devon needs to secure and promote job opportunities in higher skilled, knowledge based industries.
- 16.7 The District Council recognises the need to provide a better match between education, skills training and the needs of existing and future employers. To facilitate the improvement of the local skill base there is a need to work with local colleges and secondary schools to identify and plan for the skills need of local and incoming businesses.

**Consultation Local Plan – Draft Strategy 25  
Promoting Opportunities for Young People**

Support will be provided for initiatives that promote enhanced opportunities for access to further education, housing suitable for first time buyers and training/apprenticeships posts for young people. Large scale development proposals should incorporate measures to promote these outcomes/initiatives.

- 16.8 To help new businesses there is a need to provide start-up business space. This will improve business survival rates by providing suitable accommodation and will help to integrate support and advice and make practical use of the Business Information Point (BIP) and other business providers.

- 16.9 Working with local stakeholders to understand and plan for the needs of small and medium sized businesses will aid the facilitation of business growth in the District. It will encourage businesses, through the East Devon Business Forum, local Chambers of Commerce and associations of small businesses to have their voice heard in the development of planning policy and to provide practical help to their members.

### **Encourage Mixed-Use Development Incorporating Employment**

- 16.10 Feedback and evidence is set out below:

**What you said about Employment Provision:**

- We have heard strong support for future job growth and better jobs.
- Further job provision has been supported for towns, villages and rural areas.

**What the evidence tells us:**

- East Devon has high commuting levels to other centres for work, especially Exeter, where higher paid jobs are often found.
- Wage levels in East Devon are comparatively low.
- We have an economy that is heavily reliant on lower paid service sector jobs.
- Whilst the larger sites in East Devon's West End will attract strategic inward investment elsewhere in the District investment is more likely to be 'home-grown'.

- 16.11 In the past too much residential development has occurred without thought being given to where people will work. A consequence has been that often people will need to commute longer distances to jobs and few people can walk or cycle to jobs unless close to their homes. This is particularly true in towns where substantial residential and employment estates have been permitted as entirely separate and distinctly self-contained entities and in rural areas where little, if any, employment land has been provided despite many small residential developments being constructed.

- 16.12 We recognise that it is not always possible to integrate residential and business uses. Some businesses are dirty and noisy and can be bad neighbours. There are also large scale employment uses that require their own large sites, such as major office developments. However, many businesses can operate perfectly well close to housing. Existing employment estates will continue to serve the types of business which are unsuited to residential neighbours and some of these will need to be expanded and new sites provided but we will encourage integration between residential and employment uses wherever possible.

- 16.13 To help to secure local job provision we will seek to provide a new job for each new home we will promote mixed use developments and we will encourage the provision of employment uses close to existing areas of housing. The provision of sufficient employment land close to where people live will be done on a plan, monitor, manage basis.

## **Consultation Local Plan – Draft Strategy 26**

### **Future Job and Employment Land Provision:**

In order to secure local job provision we will promote mixed use developments and provision of employment uses close to where people live. All major housing developments will need to be accompanied by employment provision to provide around:

1. One job for each new home built.
2. Around 1 hectare of employment land for each 250 homes proposed.

In the villages we will allocate mixed use development sites and encourage the provision of a range of employment types. On residential schemes where 10 or more dwellings are proposed (or could be accommodated) in our villages and smaller towns we will require direct provision of, or a financial contribution specifically towards, small employment workspace as part of the overall development - these could take the form of small units on part of the development site. This will not apply where schemes are predominantly for affordable housing.

On smaller developments provision for home working should be incorporated into individual dwellings.

### **Rejected Options**

16.14 The following alternative to the above preferred approach has been rejected:

1. **Not seeking employment provision alongside new homes** - although it will not be the choice of everyone we consider it very important for people to have the opportunity to work close to where they live. The provision of jobs close to homes is a key strand in reducing the carbon footprint of new development, by encouraging shorter, non-car based journeys to work. It is regarded as important therefore, that there should be a policy link between new homes and new employment opportunities.

### **Resisting the Loss of Employment Land**

16.15 Where existing employment land is more appropriately designated for possible residential use we would expect the uplift in value to be properly reflected in any planning agreement or obligation (including through Section 106 agreement and Community Infrastructure Levy payment) and an equivalent area nearby to be provided for replacement employment land. Existing Local Plan policies already protect loss of employment land and we will rely on these until they are superseded through a separate Development Management Policy document.

### **Consultation Local Plan – Draft Strategy 27**

#### **Resisting Loss of Employment, Retail and Community Uses:**

In order to ensure that local communities remain vibrant and viable and are able to meet the needs of residents we will resist the loss of employment, retail and community uses. This will include facilities such as pubs, shops and Post Offices.

Permission for change of use will not be permitted unless it can be clearly demonstrated that there is no longer a need for such uses and that the building or site has been marketed for at least 12 months (and up to two years depending on market conditions) at a realistic price without interest.

### **Promoting the Commercial Prosperity and Vibrancy of our Town Centres**

- 16.16 The main East Devon towns are commercially vibrant centres offering employment, community activity, transport links and shops. The town centres serve not just their immediate residents, but also support the surrounding rural hinterland and in some cases they form a major destination in their own right, notably Honiton in respect of antiques. The new market town of Cranbrook will also develop into this service centre role.
- 16.17 Significant loss of retail and business activity from town centres, to other uses, could threaten the vitality and viability of towns. Accommodating new commercial and retail uses in towns, especially for uses that attract large numbers of people, should be encouraged. Failure to promote the retail and business opportunities in towns may result in loss of shoppers, visitors and business in general, to competing centres beyond East Devon. A better understanding of the dynamics of town centres will assist these areas in becoming viable and active places to shop and visit. By undertaking a 'health check' of town centres a record of unit vacancies can be identified and management solutions developed.
- 16.18 Activities and uses which contribute to the vibrancy, vitality and viability of town centres will be encouraged, whilst their loss will be resisted. Retail activity not easily accommodated in town centres, such as for bulky goods, will be encouraged to locate as close to town centres as possible.

### **Tourism**

- 16.19 Tourism is a key sector in the East Devon economy. The coastal towns of East Devon form one of the focal points for tourism but the draw to visitors extends beyond these resorts into the stunning coastline between them, the wonderful countryside and the picture postcard villages that East Devon has to offer. The Local Plan will support tourism throughout the District with the onus on encouraging high quality attractions, facilities and tourist accommodation. Tourism development will be encouraged, particularly where it enhances and capitalises on the geology, wildlife, coastline, countryside, historic environment and other assets that are unique to the District.

- 16.20 Tourism and the visitor economy is an important contributor to vitality and vibrancy of the District's coastal and market towns and of our rural communities. It is estimated that during 2008, staying visitors (2,857,000 visitor nights) spent some £132 million during their time in East Devon with day visitors (2,486,000 day visits) spending a further £110 million. This expenditure is key driver of local economic activity and sustains more than 7,000 jobs. Planning policy in the period to 2026 will seek to maintain and enhance the District's visitor appeal by:
- a) Supporting East Devon's hospitality businesses as they respond to the challenges of a changing visitor market.
  - b) Reinforcing the District's image as a destination of high environmental quality with a strong focus on customer care.
  - c) Working in partnership with East Devon's tourism industry to promote the District as a year round destination.
- 16.21 Devon County Council's tourism programme identifies that short breaks and activity breaks have grown substantially over recent years. The selection of water based activities and natural landscapes are a significant factor in this trend. The County publication however identifies that long holidays have declined in popularity over recent years and although families still make up the majority of the tourism market in Devon fewer families are now visiting the County.
- 16.22 Local Plan policies will seek to promote and enhance the District's tourism offer through the retention and enhancement of its accommodation stock while, at the same time encouraging investment in new high quality visitor accommodation in sustainable locations. The policies also provide for the creation of new visitor attraction businesses where these can successfully complement the high quality environment of the District.
- 16.23 The promotion of a year round tourist industry in East Devon is important to maintain a vibrant visitor and business environment for the District. Tourism can help initiate regeneration of settlements and provide an environment for enterprise and innovation. The marketing of East Devon and its tourism assets through ICT is important as this will enable visitors to access information before and during their stay.
- 16.24 East Devon's economic structure is represented by lower value sectors including those employed in the tourism industry. The district has 13% employment in tourism compared to 11% in the South West and 9% nationally. Many jobs in the tourist industry are seasonal, part time and poorly paid.

#### **Consultation Local Plan – Draft Strategy 28**

##### **Promotion of Tourism in East Devon**

The Council will support and facilitate high quality tourism in East Devon that promotes a year-round industry that is responsive to changing visitor demands. Tourism growth should be sustainable and should not damage the natural assets of the District but aim to attract new tourism related businesses that can complement the high quality environment of East Devon.

## **Housing and Affordable Housing**

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**What you said about housing and affordable housing:**

- The vast majority of people said there is a need for more affordable homes in East Devon.
- In the Issues and Options Report we asked for comments on what would be an appropriate affordable housing target as a percentage of all dwellings built. 43% of respondents supported the current target of 40%. 16% supported a higher target of up to 60%, 20% supported less than 40%, 13% did not support any of these approaches and 8% were 'Don't Knows'.
- We also asked for comments on the size of housing schemes in which affordable housing be sought. 31% of respondents thought all housing schemes should provide or contribute to provision of affordable housing. 25% thought the threshold should be 5 dwellings or more, 20% thought it should be 15 dwellings or more, 15% did not support any of these approaches and 8% responded 'Don't Know'.

**What the evidence tells us about housing and affordable housing:**

- There is a very significant need for affordable housing in East Devon and most people in need of an affordable home need a rented property. (The Exeter and Torbay Housing Market Assessment provides more details on affordable housing need<sup>41</sup>).

## **Market and Affordable Homes**

16.25 The majority of households in East Devon (around 80%) live in houses owned outright or being purchased by the occupants. Around 10% of homes are rented from private landlords and around 10% are classified as social rented homes, mostly Council owned but with some owned by Housing Associations. This last 10% make up most of what is classified as the affordable housing stock of East Devon: There are though some affordable homes that fall into what is termed the 'intermediate sector'. Social rented homes have a regulated rent to ensure their affordability. In 2010 a three bedroom social rented home would typically cost the tenant in the region of £250 to £300 a month. Intermediate affordable housing can come in a variety of forms with the most common being where the home is part-owned by the occupant with one part, say a 50% share, being purchased at an open market value and the remainder being rented at a subsidised level.

16.26 Lack of affordable housing is a critical issue in East Devon and in order to retain younger people in our neighbourhoods and communities, as well as housing others in need, we need more affordable homes. A fundamental challenge is that affordable homes are expensive to build and typically do not generate a financial return on investment as most registered social landlords (known as Housing Associations) cannot pay full market prices for new homes. In most cases they require some form of subsidy or market intervention therefore in order to be built. There is a diminishing pot of public subsidy to pay for affordable homes and increasingly the onus will need to rest on private sector developers subsidising and bringing forward provision or on other innovative solutions being found. The contribution of self build plots to the supply of new housing is recognised and contributes to the range of homes available.

<sup>41</sup> Opinion Research Services (2007 and 2011) "Strategic Housing Market Assessment"

Community self build schemes supported by Housing Associations can make a contribution to affordable housing and will be welcomed on sites that meet the policies of this plan.

- 16.27 Notwithstanding this difficulty our approach is that all new housing proposals where there is a net gain of at least one home will make a contribution towards local affordable housing. Affordable housing delivery from planning obligations is viable when the cost to the developer in the form of a discounted price to the affordable housing provider. This can be accommodated in the scheme economics without undermining profitability and the cost of this developer contribution is reflected in the price paid for the land. Our policies have been developed in light of a Strategic Housing Viability Assessment that shows that the general approach will not undermine viability and inhibit the delivery of new housing. However, the viability of individual sites can be affected by a range of site/development specific factors and the policy allows for such circumstances to be taken into account where the assessment process is completely transparent and where there is full financial disclosure by all stakeholders. Future work on the Community Infrastructure Levy charging schedule will need to inform refinement of affordable housing contributions.

### **Consultation Local Plan – Draft Strategy 29**

#### **District Wide Affordable Housing Provision Targets:**

Affordable housing will be required on all developments within East Devon where there is a net gain of one dwelling. Within the areas defined in the following table a minimum of 25% of the dwellings shall be affordable unless viability evidence shows that a higher percentage is achievable.

<b>Areas to which lower affordable housing target would apply</b>	
The following towns (1)	Axminster
	Exmouth
	Honiton
	Ottery St Mary
	Seaton
Major (2) strategic 'West end' (3) development sites	
For the purposes of this schedule:	
(1) 'towns' are defined as the area within the Built-up Area Boundary and any abutting land;	
(2) 'major' is a proposal for 300 or more homes;	
(3) 'West end' is not a defined policy area, but a term that refers to a group of schemes identified in the plan that provide for major strategic growth in the Western part of East Devon. Viability of large West End sites may show scope to provide higher percentages.	

Outside of the areas listed in the above table 50% of the dwellings shall be affordable, subject to viability considerations. The affordable housing provision should seek to achieve a target of 70% social or affordable rent accommodation and 30% intermediate or other affordable housing.

The District Council will consider issues of development viability and housing mix, including additional costs associated with the development of brownfield sites, mitigation of contamination and the provision of significant community benefits provided the assessment process is completely transparent and there is full financial disclosure by stakeholders. Affordable housing shall be provided on site unless it is either not mathematically possible or off site provision, of equivalent value, is justified by exceptional circumstances, such as no registered provider being willing to manage the new affordable units. In such cases a payment towards an off site contribution may be made in lieu of on site provision.

## Rejected Options

16.28 The following alternatives to the above preferred approach were rejected:

1. **Not seeking affordable housing** - there is a pressing need for affordable housing as demonstrated through the updated Strategic Housing Market Assessment. The Strategic Housing Viability Assessment shows that it is viable to require the provision of affordable housing as set out in the proposed policy.
2. **To not have low thresholds** - if we set thresholds below which affordable housing is not sought we would face the situation of applications deliberately coming in below these thresholds and therefore not making contributions. The Strategic Housing Viability Assessment shows that there is no pattern of viability related to the scale of housing, except where a single dwelling is removed and replaced by just one.
3. **To apply the same percentage of affordable housing throughout the District** – the Strategic Housing Viability Assessment shows that viability varies significantly across the District. It is reasonable to expect a higher percentage of affordable housing in the higher value areas than the lower value areas, since the former tend to generate additional income that can be spent on the affordable units.
4. **To adopt different thresholds in urban and rural areas** – smaller sites comprise a significant proportion of the housing supply in our urban areas and there is no evidence that viability is affected by the scale of development. Adopting a single threshold will help to deliver the maximum level of affordable housing.

**How we reached this Policy position:**

The responses to the Preferred Approach showed wide support for the provision of affordable housing through plan policy. There was a general concern that the policy had been developed in the absence of a Strategic Housing Viability Assessment. Whilst some respondents wanted to see more affordable housing provision and a higher percentage requirement in policy, some took a counter view. Many of those seeking more affordable housing advocated higher percentage requirements and lower thresholds. But the converse view was also expressed that higher percentages would render site development unviable and as such overall house building rates and therefore affordable housing provision would fall. Many respondents also considered the proposed 70%/30% tenure split between social rented and intermediate to be too prescriptive and there were some objections to the reference to 30 dwellings per hectare. Whilst there was some general support for the policy, many thought it was not sufficiently flexible and could be considered to be contrary to Planning Policy Statement 12.

The amended policy now proposed has been developed to take account of evidence provided through the Strategic Housing Viability Assessment and the pressing need to deliver affordable housing in East Devon demonstrated thorough the updated Strategic Housing Market Assessment.

### **Lifetime Homes and Housing for the Elderly and Disabled**

- 16.29 East Devon has many elderly people and this will continue to increase. As people grow older and mobility decreases or other ailments affect them their homes may no longer be suited for their needs and might require adaptation. Disabilities in younger people can also affect mobility or require adaptations to assist living. In order to ensure that we provide homes for all people in our communities it is important to ensure that a range of housing types are provided as part of all major applications, including single storey dwellings, houses adapted for independent disabled living and sheltered accommodation<sup>42</sup>.
- 16.30 In rural areas a lack of houses to meet the needs of all age groups is leading to a situation where some residents occupy unsuitable houses. Elderly single residents may live in large family houses which they are unable to maintain, afford or access upstairs, whilst there is a shortage of family homes. This may force residents to move away to towns where suitable accommodation exists but where residents are isolated from their friends and families.
- 16.31 It is proposed that the Local Plan will require all significant developments to make provision for a changing population. This will occur through a specific policy requirement to build houses to Lifetime Homes standards. The preferred approach follows the detailed considerations of the Strategic Housing Market Assessment on demographic pressures and the needs and preferences of local residents. Enabling people to remain in their own home and building in the potential for future simple adaptations is considered a major initiative to ensure quality of life of residents of all ages and mobility. The Council will consult with health and social care services on

<sup>42</sup> Community Council of Devon (2011) "Housing Aspirations of Older People living in Rural Devon"

larger planning applications and/or those that could have service provision implications.

### **Consultation Local Plan – Draft Strategy 30**

#### **Life time Homes and Care/Extra Care Homes:**

The preferred approach is that all affordable housing and 20% of market units meet Lifetime Home standards, on all major developments (schemes greater than 10 homes). Elderly provision will be required in towns and villages. Where there are high elderly population levels the council will seek to negotiate a greater proportion and/or a lower threshold. The expectation is that the majority of units would be of two bedrooms or more.

#### **We will aim to secure Care and Extra Care homes in all of our Towns and Larger Villages in line with provision of:**

- 150 Care/Extra Care Home Spaces at Exmouth;
- 50 Care/Extra Care Home Spaces at Axminster, Honiton, Sidmouth, Seaton and Ottery St Mary; and
- 10 (or more) at larger settlements with a range of facilities that have easy accessibility to a GP surgery.

### **Rejected Options**

16.32 The following alternatives to the above preferred approach were rejected:

1. **Not seeking Lifetime Homes and care/extra care provision** - to not seek such provision would be to not recognise that a need for such housing exists and with an ageing population it will be increasingly important.

### **Gypsy and Traveller Provision**

16.33 East Devon has relatively few permanent sites for Gypsies and Travellers and unauthorised sites are occasionally reported but this tends to be a short-term seasonal problem. A Needs Assessment of Gypsies and Travellers in Devon<sup>43</sup> was undertaken recently which established a need for 9 permanent pitches in the period up to 2011. The majority of these have been accommodated through planning permissions and it is anticipated that the remaining need will be met through expansion of existing sites so we are not actively seeking to allocate additional sites. Development Management policy will be used to assess applications.

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<sup>43</sup> University of Plymouth (2006) "Devon-wide Gypsy and Traveller Housing Needs Assessment"

## Community Facilities

- 16.34 Community Facilities are at the heart of every town and village in the District. They vary enormously but most offer meeting places hosting numerous social, cultural and other activities and space for sport and recreation, usually run and financed by the local community. Many settlements also offer a school and in some cases a library and medical facilities which tend to be funded through the County Council education and health authorities. Many residents use these facilities on a daily basis and for some, particularly the elderly, young and those without transport in the rural areas. They are an essential lifeline. Parish Plans and other community-produced documents consistently identify the retention of existing community facilities and the provision of additional ones as key issues, highlighting just how crucial they are to residents' lives.
- 16.35 We need to make sure that community facilities, especially village halls, schools, public transport and the facilities which are used on a daily basis, remain viable and that additional facilities accompany new development. Local communities must be involved in the way their homes and neighbourhoods are maintained or developed. We need to reduce the number of people who feel marginalised by their own communities or who find it difficult to access the services and facilities that they require. There are two main issues relating to community facilities:
- Providing new facilities, particularly in those areas where new development will add extra pressure or where there are already shortfalls.
  - Resisting the loss of facilities where they do already exist.
- 16.36 The planning system aims to co-ordinate new development with the infrastructure it requires. Depending on the scale of new development, community facilities are provided by the developer as an integral feature of new areas of housing, or financial contributions are sought towards facilities elsewhere in the settlement. Developers cannot be expected to make up for an existing lack of facilities though only to provide for the demand generated by their new development.
- 16.37 Some places have a shortage of community facilities but in others the existing buildings are in such a poor state of repair or are so physically constrained that improvement or extension is not viable. Lack of facilities is worsened by the loss of facilities in some settlements, for example where buildings and land are sold for higher value use particularly to residential development. This is compounded by high land values within settlements that make it difficult to purchase sites for relatively 'low value' community use. We will seek to resist the loss of any facilities where their loss would leave a local community without similar alternative provision.
- 16.38 Sharing buildings with other community groups can help to reduce costs. It is acknowledged that many community halls are so successful that they are already at capacity. Regular use by paying organisations for example post office, cyber-cafe, health visitor, play group, health facilities for the elderly can also reduce costs. Educational buildings have been shared successfully for a number of years, particularly by the District's Community Colleges, where the school has priority use of buildings and facilities but the community has access to them at agreed times. This



makes an important contribution to recreation and education provision and reduces building and operational expenses. It also reinforces the importance of a school within the local community and encourages lifelong learning. To date, school libraries, halls, places of worship and sports facilities have been successfully shared with many schools offering evening and weekend vocational and non-vocational classes. There may be scope in some communities to increase access to private sports and recreation facilities by the public.

- 16.39 Some settlements have no centrally located sites which would be suitable for new community facilities, either due to lack of space or because alternative land uses will drive land purchase costs out of the community's reach. In some cases a house or other local building has been used on a temporary basis to prove that the perceived demand actually exists and to secure funding for a permanent building. In most cases though, edge of settlement sites might be considered suitable, and more affordable as they would not be designated for higher value development, whilst still being accessible to the local community. We will continue to promote the development of new community facilities whilst resisting the loss of existing facilities.

## **Education and Health**

- 16.40 Education and health facilities are key to vibrant, self-contained communities and play a vital role in reducing social isolation, reducing the need to travel and improving quality of life. The District Council is not responsible for providing education or health care which are usually the responsibility of the Local Education Authority and the Local Health Authority respectively but financial contributions can be sought from developers where new development will place additional demand on their services. Health care and education will be integrated into large new developments at the planning stage.
- 16.41 Many settlements in the District offer primary school education, with the potential for free schools and Academy status, and these are usually easily accessible by walking and cycling, reducing travel by private car. We are concerned that the ageing population trends in the District will reduce the numbers of young people attending schools and some, particularly the smaller, more rural primary schools, may be forced to close as pupil numbers become unsustainably low. In these settlements some additional housing may help to maintain school numbers and support the retention of these schools. Sharing of school facilities, for instance by the local community outside school hours, can reduce overheads and generate additional income.
- 16.42 Secondary and sixth form education is available through community colleges in most towns across the District and a school bus network can reduce private car reliance by pupils travelling in from outlying areas. Falling pupil numbers may reduce the existing pressure on some secondary schools and this may mean the loss of existing temporary classrooms. Higher Education is lacking in the District, since the closure of Rolle College in Exmouth, and residents usually travel outside the District or study by correspondence course to obtain higher qualifications. Bickton College still plays an important role in Further Education provision in countryside management and rural studies, with a strong emphasis on vocational training. Expansion of the services offered by Bickton will be encouraged and supported. Most of our secondary schools

also offer courses to all age groups in a range of skills and subjects and can be instrumental in training local people for good quality jobs and apprenticeships.

- 16.43 There are GP surgeries and other health care professions such as dentists and opticians and alternative therapy practitioners in all towns across the District and accessing such facilities is straightforward for most residents. Most towns also have a small community hospital offering in and outpatient treatment and the opportunity to be seen by visiting specialists. This reduces the need to travel outside the District for health care and, as the elderly and disabled residents are both the greatest users of health care services and the IEast mobile, also reduces the stress and expense associated with appointments. As the population of East Devon ages and health care provision reaches capacity additional provision will have to be made. Some communities like Exmouth will have ambitions not only to retain existing facilities, but also to enhance health facilities. The Council will work with service providers to assist communities achieve such aspirations.
- 16.44 In rural areas health care provision is far more difficult to access with irregular public transport and few, if any, local surgeries or other care. Additional development in the villages is unlikely to achieve sufficient numbers to justify permanent provision of a surgery or dentist but there is scope for a mobile service to visit small towns and large villages on a regular basis. Private pharmacies will collect and deliver prescription medicines upon request meaning that regular prescriptions can be obtained without travelling. We will retain and continue to use East Devon Local Plan policies as a means to promote the development of new education and health care facilities whilst resisting the loss of existing facilities.

## **Transport**

- 16.45 Having access to employment, shops, schools, health care and other community facilities is essential for meeting people's everyday needs. Many working residents commute out of the settlements in which they live and by far the most popular mode of transport is the private car. This adds to congestion, carbon emissions, increases demand for car parking and reduces demand for, and viability of, public transport. Many car users could easily walk or cycle short distances and benefit from the associated health benefits and financial savings, but lack of pavements and traffic calming measures are often cited as reasons not to do so. Provision of safe footpath and cycle path routes will be an intrinsic planning consideration in larger applications and smaller developments may be required to contribute towards nearby schemes. This is discussed in more detail in the next Section under Green Infrastructure.
- 16.46 Lymptone, Exton, Whimble and Feniton are the only villages to benefit from railway stations and there are large areas of rural parts of East Devon which have few, if any, essential services or community facilities within walking or cycling distance and either no bus service or a less than daily service so that they are totally dependent upon the private car. The Local Plan will seek to increase the provision of public transport to the rural areas so that residents have a choice of modes of transport and are not 'trapped' in their homes if they do not own cars.

- 16.47 The towns of the District are much better served by public transport than the rural areas, with Axminster, Honiton and Exmouth having railway stations with direct links to Exeter and all towns benefiting from frequent daily bus services. There are many local initiatives, such as hopper buses and ring-and-ride services, which are well used by residents but all the main towns have identified a need for park and ride schemes to reduce town centre congestion and demand for car parking. The Local Plan will support such schemes where it can be demonstrated that there is sufficient demand and that they will be viable.
- 16.48 As technology progresses there will be scope to include innovations which will make transport based on renewable energy and producing low carbon emissions more readily available to the public. An example of this is the recent increase in electric car usage. Charging points for electric vehicles should be made available in new developments throughout the District to ensure that those residents and visitors who wish to use them can easily do so.

### **Safe Communities**

- 16.49 East Devon has one of the lowest rates of crime and disorder in the South West and in the country as a whole. Whilst the rate of crime is very low the fear of it is disproportionately high although there are pockets, particularly in urban areas, where anti-social behaviour can be a problem. The Crime and Disorder Reduction Partnership for the plan area is the East and Mid Devon Community Safety Partnership which also oversees the work of the East Devon Domestic Violence Forum, the Diversity Group and the Drug and Alcohol Implementation Group. In designing new development we will ensure that measures are taken to reduce the likelihood of crime and increase personal safety, for instance through lighting, overlooking of shared public spaces and deterrent planting.
- 16.50 We want to ensure that all of our communities are safe and cohesive, provide access for all and are designed to ensure community safety. We will provide and support measures and initiatives that strengthen the quality of life for new and existing residents of the district. We will also address those areas, particularly in Exmouth and Honiton, where we are aware that pockets of deprivation and health inequalities exist.

#### **Consultation Local Plan – Draft Strategy 31**

##### **Community Safety:**

Through the East and Mid Devon Community Safety Partnership the Council will work to reduce crime and the fear of crime in the District. The Council will encourage new development that has been designed to minimise potential for criminal activity and incorporates the principles of 'Secured by Design' and will support development proposals aimed specifically at improving community safety.

- 16.51 The following alternative to the above preferred approach was rejected:

1. **Not seeking to (explicitly) promote community safety** - crime levels in East Devon are low but there is a fear of crime. To not seek community safety measures could exacerbate concerns about fear of crime further.

**TO MAKE COMMENTS ON CHAPTER 16:  
ENSURING WE HAVE THRIVING COMMUNITIES  
visit:**

**[www.eastdevon.gov.uk/draftlocalplan16](http://www.eastdevon.gov.uk/draftlocalplan16)**

## 17 Climate Change

### Climate Change and Low Carbon Development

- 17.1 The best available evidence shows that we are seeing and can expect to see future changes in the global climate as a consequence of past and ongoing greenhouse gas emissions. These changes could escalate in the future and it is therefore essential that in East Devon we plan for greater energy efficiency and generation of energy from renewable sources. There can also be economic benefits to be gained as well. This chapter of the plan addresses these themes.

#### **What you said about carbon reduction:**

- There is strong support for specific areas or locations to be identified for renewable and low carbon generation with respondents mainly supporting small scale localised solutions. Others felt that all areas of the district should be considered with opportunities taken as they arise.
- 22% of respondents to the Issues and Options report supported the Local Plan requirement for on-site renewable energy production while 49% supported a higher standard. 27% favoured an alternative approach with the matter considered against other objectives, particularly as the issue is being addressed nationally (Code for Sustainable Homes)

#### **What the sustainability appraisal and other evidence tells us about carbon reduction:**

- Climate change needs to be given due prominence in decision making. Innovative solutions need to be sought to ensure that some sustainability considerations do not constrain the achievement of low and zero carbon development. It is entirely possible to achieve positive outcomes by balancing apparently conflicting sustainability measures.
- Allocating sites for renewable energy production sends a positive message to developers that East Devon is proactive in encouraging renewable and low carbon energy generation.
- The biggest contributors to CO<sub>2</sub> emissions in East Devon are the road transport and domestic sectors at 36.8% and 35.8% respectively. In the South West overall the top two contributors are the industry and commercial sector and domestic sector, at 36.1% and 32.8% respectively.
- Per head CO<sub>2</sub> production is high in the East Devon District (8.4 tonnes) compared with Exeter (5.7 tonnes) but similar to the regional average of 8.2 tonnes. This is characteristic of a predominantly rural area with a higher reliance on road transport.
- Flooding risk in East Devon is expected to worsen with projected sea level rises and wetter winters. Areas of Flood Zones 2 and 3 are identified around all of the main rivers in the District as well as many of their tributaries.
- There is strong support for significant weight to be given to low or zero carbon construction throughout the District with house building being a key player.

## Transition to a Low Carbon Economy

- 17.2 The Climate Change Act (2008)<sup>44</sup> has put in place legally binding targets for the UK to achieve an 80% reduction in greenhouse gas emissions by 2050 with reductions of 34% by 2020, against a 1990 baseline. Emissions from buildings account for approximately half of all emissions nationally. There is little scope to force existing buildings to become more energy efficient, other than by offering incentives to upgrade and making renewable technologies a requirement of applications for refurbishment or extension, but all new development will be required to be “low carbon”.
- 17.3 As demand for fossil fuel energy grows, energy prices are rising. This threatens the security of energy supply as well as increasing the likelihood of fuel poverty. An important means of mitigating this risk is by reducing the demand for energy from new and existing development through improved efficiency measures.
- 17.4 There is strong evidence that the climate is changing<sup>45</sup>. The outcome for East Devon is predicted to be increases in summer temperatures, greater fluctuations in weather, uncertainty surrounding rainfall trends and an increased risk of flooding. These have the potential to increase risks to health and comfort, cause damage to buildings and infrastructure and increase building energy consumption from cooling. It is important that new development responds to these risks.
- 17.5 In addressing climate change and energy security the planning process can not only mitigate against the risks but can help to turn them into opportunities for local businesses, giving East Devon a competitive advantage and helping it to prosper in the future. The implementation of planning policy at a local level is crucial to deliver the radical reductions in energy demand and greenhouse gas emissions required to support the national transition to a Low Carbon Economy. The scope of policy can cover the appropriate location and layout of new development, and provide active support for energy efficiency improvements to existing buildings and the delivery of renewable and low-carbon energy infrastructure.
- 17.6 All development proposals must be planned over the lifetime of the development to ensure that the maximum potential for reducing carbon emissions and minimising the risks posed by climate change are achieved. Developers must be mindful of the carbon emission standards which will be required for later stages of the build programme as decisions taken at the outset can compromise the viability of emissions reduction in latter phases. In some parts of the District it will be possible to generate energy locally at a scale which could serve the local area, for instance through a Combined Heat and Power scheme. New development should include infrastructure to enable it to be connected to such CHP schemes, whether they already exist or may be provided in the future. Where low carbon technologies are not installed new buildings should be designed for easy installation and/or adaptation at a later date.

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<sup>44</sup> Climate Change Act 2008, <http://www.legislation.gov.uk/ukpga/2008/27/contents> (accessed 7/10/11)

<sup>45</sup> The UK Climate Projections 2009, <http://ukclimateprojections.defra.gov.uk/> (accessed 7/10/11)



## **Development that Minimises the Demand for Energy**

- 17.7 Buildings and their associated infrastructure perform essential economic and social functions, though they result in a significant environmental burden during their construction, occupation and demolition.
- 17.8 The Government has established that through Part L of the Building Regulations<sup>46</sup>, emissions allowed from new buildings will be reduced incrementally and that “zero carbon” buildings will be required within the plan period. The definition of “zero carbon” has introduced three concepts; “energy efficiency”, “carbon compliance” and “allowable solutions”.
- 17.9 Evidence suggests that in spite of increasingly strict standards at the point of build new development often fails in practice to deliver expected carbon emissions reduction. This may be due to the way in which occupants subsequently operate their buildings rather than any fault with the building process. Developers will be expected to commit to extended periods of Post Occupancy Evaluation and commissioning of building systems to demonstrate their intent to ensure that new development operates as effectively as possible and that calculated carbon reduction is realised in practice.
- 17.10 The broader sustainability performance of a development is most commonly measured using either the Code for Sustainable Homes (CSH) for residential development or BREEAM for non-domestic development. It is expected that these standards would be used to demonstrate the environmental performance of developments greater than 10 homes or 1,000m<sup>2</sup> for non-domestic buildings.
- 17.11 Recent analysis by CLG (2011)<sup>47</sup> has shown that the most significant cost to meeting the CSH is in reducing carbon emissions. The national timetable for “zero carbon” homes is expected to require Code Level 4 energy standard from 2013 and Code Level 5 energy standard from 2016. The CLG analysis has shown that the non-energy requirements for CSH Code 4 can be achieved with minimal cost uplift for a broad range of development types. It would therefore be reasonable to expect homes from 2013 to meet Code Level 4 of the CSH. Developers may feel there is additional value in obtaining Codes 5 or 6 of the CSH from 2016 or earlier.
- 17.12 Proposals for well designed, sustainable buildings will be supported unless it would cause harm to a heritage asset or its setting, and this would not be outweighed by the proposal’s wider social, economic and environmental benefits. This will also apply in the case of refurbishment of existing development, for example regarding the fitting of external insulation to properties with solid walls.
- 17.13 Higher levels of building sustainability, in advance of those set out nationally, will be sought for larger scale developments such as those in the West End or other localities

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<sup>46</sup> Part L (Conservation of Fuel and Power) of the Building Regulations,  
<http://www.planningportal.gov.uk/buildingregulations/approveddocuments/partl> (accessed 7/10/11)

<sup>47</sup> Cost of Building to the Code for Sustainable Homes, CLG 2011  
<http://www.communities.gov.uk/documents/planningandbuilding/pdf/1972728.pdf> (accessed 7/10/11).

in the District where there is the potential for over 10 hectares of new development either housing or other buildings.

- 17.14 Proposed development will demonstrate how the scheme presented will minimise vulnerability and provide resilience to impacts arising from climate change. Specifically, this will include the increased risk of summertime overheating and subsequent potential requirement for artificial cooling, water stress, and flooding.

### **Consultation Local Plan – Draft Strategy 32 Sustainable Design and Construction**

Proposals for new development, and for refurbishment of, conversion or extensions to existing buildings will be expected to demonstrate through a Design and Access Statement how sustainable design and construction methods will be incorporated, specifically, through the use of renewable energy technology, landform, layout, building orientation, massing and landscaping. The proposals must also demonstrate how the development will be resilient to the impacts of climate change.

Developments of 10 or more dwellings or 1,000m<sup>2</sup> of commercial floor space should be assessed using the CSH or BREEAM, with housing developments meeting at least CSH Level 4 from 2013. Smaller schemes will also be assessed where it is viable to do so.

Due to their scale, developments in the West End and developments over 10ha or 300 dwellings elsewhere in East Devon should achieve levels of sustainability in advance of those set out nationally. The Council will wish to see homes built to Code for Sustainable Homes Level 4 and this will be a material consideration as will incorporation of proposals for water harvesting and handling waste. In building refurbishments the Council will encourage integrating of renewable energy into existing buildings.

### **Renewable and Decentralised Energy**

- 17.15 Whilst reducing the demand for energy through efficiency measures will be crucial to lowering carbon emissions, reducing the carbon intensity of the energy we consume will also play a critical role in helping the UK to meet its climate change targets. The Renewable Energy Directive (2009)<sup>48</sup> sets a target for the UK to achieve 15% of its energy consumption from renewable sources by 2020. As well as reducing environmental impact, renewable energy can also offer diversity and security of supply. East Devon recognises its responsibility to contribute to energy generation from renewable or low-carbon sources in the District.

- 17.16 The potential renewable energy resource in the District has been assessed by the Council<sup>49</sup>. There is the potential to adopt a variety of technologies at different scales, from domestic to commercial, across the District. This ranges from a relatively modest

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<sup>48</sup> Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009, <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:140:0016:0062:en:PDF> (accessed 7/10/11)

<sup>49</sup>, D Lash and A.D.S Norton, SWEEG Internal Document 790, (2011) "An Initial Review of Renewable Energy Potential in East Devon"

number of commercial scale wind turbines, which could provide a quarter of all carbon savings from renewable energy, to a very large number of much smaller on-site installations such as photo voltaic panels to produce domestic electricity and hot water, and heat pumps.

- 17.17 A large proportion of East Devon's land area is covered by environmental designations such as Areas of Outstanding Natural Beauty. Much of the coastline is also designated as a World Heritage Site. Once these, and other constraints such as wind resource and exclusion zones around existing houses have been accounted for, there is still the potential for some commercial scale wind generation within the District. There is also the potential for a Centralised Anaerobic Digestion plant and large photo voltaic.
- 17.18 Significant weight will be given to the wider environmental, social and economic benefits of renewable or low-carbon energy projects whatever their scale. Planning permission will not be refused for a renewable energy project because local renewable energy resources have been developed.

**Consultation Local Plan – Draft Strategy 33**  
**Renewable and Low Carbon Energy Projects**

Renewable or low-carbon energy projects in either domestic or commercial development will in principle be supported (though taking account of potential adverse impacts on features of environmental and heritage sensitivity) provided applicants have taken appropriate steps to avoid and then mitigate any adverse impacts through careful consideration of location, scale, design and other measures.

- 17.19 Analysis by the Council has shown that there is great potential for on-site renewable energy technologies. As the requirements of Part L of the Building Regulations are tightened, increasing amounts of low or zero carbon technologies will be required. Incentive schemes such as the Feed-in Tariffs and the Renewable Heat Incentive have improved the viability of small scale renewable energy. As such specific percentage targets for the proportion of energy met by renewable energy sources are not stipulated. Reducing the demand for energy through efficiency measures still remains a cost effective means of helping to meet the regulations, and could help reduce the size of required renewable technology.
- 17.20 The presumption will be made in favour of sustainable development for community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning.
- 17.21 New development should come forward in locations and ways which reduce greenhouse gas emissions. This means locating development close to everyday facilities and public transport. The density and mix of building types and use proposed in a development should be mindful of the energy load across the development. Higher densities and combinations that provide a balanced heat load are likely to provide greater potential for cost effective low carbon energy solutions.

- 17.22 District Energy Networks enable the use of large scale heat and/or electricity generation technologies to supply a number of nearby homes and businesses. Networks can vary in size from 20 homes to 2,000 homes or more. Even when using natural gas, Combined Heat and Power (CHP) systems can provide significant carbon emissions reduction. However it is important the CHP systems are designed to avoid the situation where excess heat is not used while electricity is generated. Small gas CHP systems can be viable for as few as 250 homes. On a larger scale the district energy system East of Exeter is perhaps the best example of renewable CHP in the country.
- 17.23 In parts of the District where there is the potential for over 10 hectares of new development (either housing or other buildings), developers will be expected to contribute to community heating, hot water and cooling systems and CHP and provide the infrastructure required as an integral part of the development. Where it is proposed not to employ such systems, developers must demonstrate why they are not viable over the life of developments in that locality.
- 17.24 District energy systems rely on high numbers of users to make them viable so it is essential that, where new development is happening within reach of an existing or potential heat network, that new users connect to the system and provide infrastructure to easily enable subsequent future development to also connect to the network. While heat is not regulated in the same way as gas or electricity, heat network operators offer competitive long term contracts typically at prices slightly under those of substitute fossil fuel systems. Capital costs are similar to traditional heating systems and equipment is much more compact compared to fossil fuel alternatives.
- 17.25 The West End is planned to contain approximately half the proposed housing and employment space in the District. Proposed development in this locality should connect to the District Energy Network.

#### **Consultation Local Plan – Draft Strategy 34**

##### **Decentralised Energy Networks**

Decentralised Energy Networks will be developed and brought forward. New development (either new build or conversion) with a floor space of at least 1,000m<sup>2</sup> or comprising ten or more dwellings should connect to any existing, or proposed, Decentralised Energy Network in the locality to bring forward low and zero carbon energy supply and distribution.

Where there is no existing Decentralised Energy Network in the locality, proposals for larger developments of 10 hectares (either housing or other buildings) or 300 houses should evaluate the potential for such systems and implement them where they are viable over the life of the developments in the locality. Consumer choice of energy sources will be retained when decentralised Energy networks are developed.

## Offsite Solutions

17.26 The requirement for new buildings to be “zero carbon” will occur within the timescale of this plan and is likely to require the adoption of Allowable Solutions. Allowable solutions is a concept that has been developed to account for the fact that it may not always be possible to achieve zero carbon on-site using carbon compliance measures (i.e. energy efficiency and renewable energy). Whilst the exact definition for measures that would meet the requirements for allowable solutions has not yet been established, it is likely to include additional measures that may be either “on-site” (but not duplicating carbon compliance measures), “near site” (within the Local Planning Authority area) or “off site” (outside the Local Planning Authority area). Analysis by the Zero Carbon Hub has shown these could be used to account for up to 56% of emissions from a flat or 40% of emissions from a detached house. The amount may be lower if increased carbon reduction can be achieved on-site, and this would be the preferred route, in particular increased energy efficiency, as such measures are more robust as they are embedded in the design and fabric of the building.

17.27 Allowable solutions could make a significant contribution to delivering carbon reduction schemes within East Devon. The Council intends to establish a Community Energy Fund to use Allowable Solutions payment to deliver additional carbon reduction measures in East Devon. These measures may include but are not limited to energy efficiency measures in existing buildings, decentralised energy networks, or renewable energy schemes. The fund will deliver carbon reduction and maximise the benefits to local communities. This is in keeping with the developing Localism Agenda.

### **Consultation Local Plan – Draft Strategy 35**

#### **Allowable Solutions**

In some instances on site provision of renewable technologies will not be desirable or appropriate. Where this is the case developments can meet requirements through contributing to ‘off site’ provision in the form of making ‘Allowable Solutions contributions’. Monies gathered will contribute to a ‘Community Energy Fund’ that will be used to pay for/contribute to energy conservation/renewable initiatives.

**How we reached this Policy position:**

We are legally required to achieve an 80% reduction in greenhouse gas emissions by 2050 with reductions of 34% by 2020, against a 1990 baseline. Emissions from buildings account for approximately half of all emissions nationally so there is huge scope to reduce emissions as part of new development.

Consultation demonstrated strong support for setting challenging renewable energy production and carbon reduction targets, although significant concerns regarding the possible environmental impact of major schemes for instance wind turbines may be supported.

Policy recognises that on major development sites the economies of scale are such that much higher measures can be incorporated, therefore the thrust of Policy is to encourage and support small scale renewable energy production and carbon reduction measures whilst setting strict requirements in larger schemes.

**TO MAKE COMMENTS ON CHAPTER 17:  
CLIMATE CHANGE visit:  
[www.eastdevon.gov.uk/draftlocalplan17](http://www.eastdevon.gov.uk/draftlocalplan17)**



## 18 Our Outstanding Natural and Built Environment

- 18.1 We are proud of East Devon's outstandingly beautiful environment and we regard it as essential that we conserve and enhance it so that future generations can have the same high quality of life as we do. The special and varied places within our District are recognised nationally and internationally for their landscape quality, biodiversity, geology and built heritage. East Devon is an outstanding place to live, work in and visit due to the unique quality of its natural environment and these natural assets. These qualities in-turn provide economic and social well being to residents, local businesses and visitors to the District<sup>50</sup>.

### Green Networks and Green Infrastructure

- 18.2 Green networks (also known as green infrastructure) comprise the spaces within and around settlements, and the movement routes within and between them, or to other destinations (such as the coastline) for both people (residents, workers, visitors) and wildlife. Green networks will create high quality, attractive settings for day-to-day living and recreation, will enhance the character and diversity of the landscape and will protect heritage assets that contribute to the area's unique sense of place and cultural identity. They will enrich the area's wildlife value, offset negative impacts of habitat loss and fragmentation and retain or create habitat linkages. Where a water course is incorporated the corridor will serve numerous purposes such as sustainable drainage systems, wildlife routes, and leisure and recreation. We will:
- Develop a District-wide Green Infrastructure Strategy as a Supplementary Planning Document, with Area Frameworks for each town linked to its rural surroundings.
  - Exploit fully the opportunities that green networks present to make leisure and recreation spaces throughout the district accessible to as wide a range of people as possible.
  - Provide space for community allotments.

### Green Infrastructure and Recreation

- 18.3 Feedback and evidence is set out below:

#### **What you said about Green Infrastructure and Recreation:**

- Improve and publicise routes between communities (safe, clean, green) – promote linkage of Public Rights of Way and investment in opportunities, for example – disused railway lines etc.
- Ensure adequate investment in open spaces, sport and recreation facilities within towns and villages, – for example Skateparks, playing pitches
- Utilise natural features – improve facilities, for example on beaches, toilets, showers, improve accessibility for all walkers/cyclists into countryside

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<sup>50</sup> LPA's, NE and Growth point Strategy (2009) "Exeter Area and East Devon Green Infrastructure"  
[http://www.Eastdevon.gov.uk/planning-ldf\\_greeninfrastructure](http://www.Eastdevon.gov.uk/planning-ldf_greeninfrastructure)

- Promote local food production – provide more allotments and community gardens.
- Ensure public consultation takes place to ensure local involvement and ownership

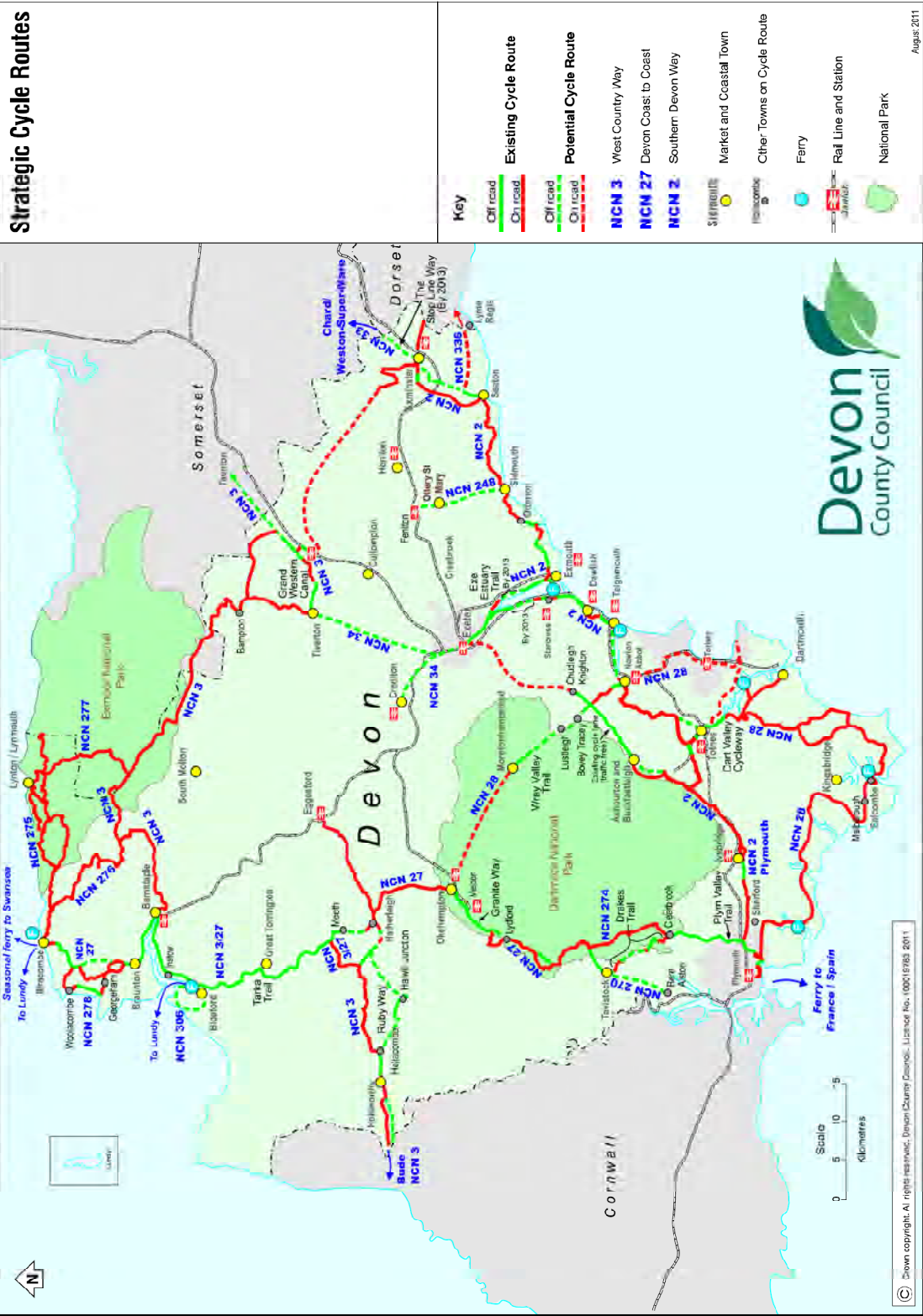
**What the sustainability appraisal and other evidence tells us about Green Infrastructure and Recreation:**

- Green Infrastructure principles should be adopted in the design, layout and siting of any development in the District ensuring that environmental services are retained and enhanced and that building design is sensitive to and enhances local character.

### **Promoting Green Infrastructure**

- 18.4 A Green Infrastructure Strategy document is being prepared and this will examine and promote opportunities to link green spaces together through footpaths and cycle links. This work will also help define schemes that can go into an associated Strategic Projects and Investment Programmes.
- 18.5 The District Council in conjunction with Devon County Council and supporting the work of Sustrans has been keen to see provision of new cycle routes. The map below shows the main strategic cycle routes in East Devon that exist or are proposed (note that local routes, especially in towns, are not shown).

Strategic Cycle Routes



- 18.6 Green Infrastructure is seen as an essential part of our Vision for a long-term sustainable future for East Devon. The Council is committed to developing strategic networks of accessible, multi-functional sites (including parks, woodland, informal open spaces, nature reserves and historic sites) as well as linkages (such as river corridors and flood plains, wildlife corridors and greenways). These contribute to people's well-being and together comprise a coherent managed resource responsive to evolving conditions. The Axe Estuary wetlands are an example of a multi-functional green space which is currently an important wildlife habitat but in time will expand in terms of its size and value for recreation, biodiversity and community use.
- 18.7 Liaison with Town and Parish Councils will ensure local desires and needs are understood and inform the priorities for strategic projects and investment programmes.

### **Consultation Local Plan – Draft Strategy 36 Green Infrastructure Provision and Strategy**

We will develop a District wide Green Infrastructure Strategy and will focus on delivery of Strategic Projects and Investment Programmes. The document will produce separate sections for each town (Area Frameworks) linked to the rural parts of the District to ensure that consistency and a comprehensive output is achieved.

### **Rejected Options**

- 18.8 The Preferred Approach in respect of green infrastructure is favoured over the following alternatives:
1. **Not to develop a policy approach on Green Infrastructure** - this would undermine the value the countryside and coast contribute to the local economy and stifle sustainable development.
  2. **Not to develop a Green Infrastructure Strategy** - this would undermine the Strategic Objectives to conserve and enhance facilities to support healthy and socially inclusive communities.

### **Open Space, Sport and Recreation**

- 18.9 As well as providing fun, exercise and a sense of achievement for all, participation in sport and active recreation underpins people's quality of life and is fundamental to the delivery of broader Government objectives. This would include the creation of sustainable communities, health and well-being, social inclusion and educational attainment. We want all residents in the District to have convenient access to open space and recreation facilities that are of good quality, safe and if admission is payable at a reasonable price<sup>51</sup>.

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<sup>51</sup> Fields in Trust (2011) "Planning and Design for Outdoor Sport and Play (was 6 acre-standard)" [http://www.fieldsintrust.org/Product\\_Detail.aspx?productid=dc291578-50c5-49c5-b0d7-3c376db6b801#](http://www.fieldsintrust.org/Product_Detail.aspx?productid=dc291578-50c5-49c5-b0d7-3c376db6b801#)

- 18.10 We will promote better health and well-being for all by ensuring that new housing development are within walking distance of good quality formal and informal open space and recreational facilities. Exercise should be encouraged by the promotion of cycling and walking within developments and by enabling easy participation in sport through the provision and improvement of built sports facilities.
- 18.11 The relatively aged population structure of East Devon will affect demand for facilities that are suitable for older people, which Sport England identifies as swimming, bowls, tennis, golf and keep fit facilities.
- 18.12 An Open Space Strategy<sup>52</sup> is currently under preparation which comprises identification and mapping of open spaces; audits of quantity, quality, and accessibility; Geographic Information Systems analysis to establish current levels of provision and identify needs. Public consultation has helped to establish community aspirations and requirements for open space; and the work will help establish the creation of local standards, both urban and rural, based on current provision, national standards (to include – Fields in Trust, Angst (Alternative Natural Green Spaces) and Sport England standards in both urban and rural areas), consultation results, and demographic analysis. An Action Plan will be produced for the future implementation of the strategy.
- 18.13 The strategy will contain evidence based requirements for developer contributions towards the provision of open space, identified through the above processes. The strategy should be consulted to establish whether on or off-site provision should be made.
- 18.14 The recommended open space standards and Local Need Area boundaries provided by the Open Space, Sport and Recreation Strategy 2011 will be adopted for the Plan area. Contributions will be directed towards meeting quantity, quality and accessibility shortfalls. The option will aim to deliver a combination of new facilities and improvements to existing ones, depending on the unique needs of the Local Needs Areas and the availability of land. The current work will help update work undertaken in 2002 on a Playing Pitch Strategy for East, Mid and West Devon.<sup>53</sup> This earlier strategy documents quantifies and assesses quality of open space provision.
- 18.15 This option will conserve, where appropriate, existing open spaces and leisure facilities identified in the Local Plans and will not permit their loss unless their whole or partial redevelopment would result in greater benefits to the community than retaining that facility. Protected sites will be identified through future policy work. The proposed open space 'implementation and delivery plan' will identify opportunities to maximise the use of existing sites and potentially re-designate sites for alternative leisure uses, in line with local needs.

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<sup>52</sup> This strategy is in preparation for the council by JPC and Belap consultants. The study will be posted on the Council's web site when complete but initial standards from the Consultants have been translated into draft policy.

<sup>53</sup> PMP Consultancy(2002) "A Playing Pitch Strategy for East, Mid and West Devon"

### Consultation Local Plan – Draft Strategy 37 Open Space Standards

Open space standards will be defined on the basis of a Local Need Area approach (including urban and rural standards) with the draft standards below establishing an initial assessment/provision. Development schemes of new homes will need to provide and help secure provision to match defined standards. Developer contributions for the provision of open space will be applied to residential schemes of 1 unit net gain or greater.

Existing open space sites will be protected and, where appropriate, new sites designated.

Open space type	Recommended accessibility standard (straight line distance) – all tbc	DRAFT Recommended quantity standard (hectares per 1000 population)	Recommended quantity standard (square metres per person)
Parks and Recreation Grounds	e.g. 450m	tbc	
Amenity Green Space	e.g. 450m	0.3 – 0.4 ha	3.0 – 4.0 sq m
Natural & Semi-natural Green Space	e.g. 600m	1.0 ha minimum	10.0 sq m
Active Outdoor Sports Fixed	e.g. 600m	0.10 – 0.15 ha	1.0 – 1.5 sq m
Active Outdoor Sports – Pitches	e.g. 600m	1.0 – 1.3 ha	10.0 – 13.0 sq.m.
Play space - Children	e.g. 450m	0.08 – 0.10 ha	Up to 1 sq.m
Play space - Youth	e.g. 450m	0.02 – 0.05 ha	Up to 0.5 sq.m
Allotments	e.g. 600m	0.25 ha	2.5 sq m
<b>TOTAL</b>			
<b>These standards will need to be refined in line with needs assessment and separate urban and rural area assessments.</b>			

18.16 The Local Plan will include a developer contributions policy which seeks to deliver new open space and enhancements to existing facilities in step with new residential development. Funding acquired through developer contributions will be complimented by other sources of funding where it can be secured. Where appropriate in terms of location and the nature of the development; and where a local need for small scale facilities has been identified, an on-site contribution will be preferable. It may be appropriate for earlier developments to provide the land upon which later developments pay for structures or equipment. The policy will aim to deliver a combination of new facilities and improvements to existing ones, depending on the unique needs of the Local Need Areas (LNA) and the availability of land.



- 18.17 Population increase will be used to determine the relative demand created by different developments. For residential development contributions will be on a per-dwelling basis and the level of contribution will be higher for larger housing than for small houses or flats. This will be determined by the average occupancy rates where the average occupancy acts as a multiplier reflecting population increase.
- 18.18 To provide an evidence base upon which to base the contributions policy the Councils will produce an 'implementation and delivery plan' which will include a list of the priority needs and objectives for each LNA and specific opportunities for new or enhanced provision. The plan will provide costs for establishing and maintaining a range of formal and informal leisure facilities, which will then be factored into the calculation of per-dwelling (residential) and per-hectare (commercial) developer contributions. The plan will also provide developers with clarity about which form of contribution they will be required to make. Applicants should consider how their development can meet the identified priorities, either through on-site provision within the development or, through a financial contribution.
- 18.19 When considering sites for new open space and leisure provision, priority will be given to sites which are easily accessible by a range of transport modes and which can be integrated into a network of green infrastructure.

## **Coastal Areas**

- 18.20 East Devon's exceptional coastline forms part of a World Heritage Site (WHS) and is mostly undeveloped. Parts of the coast are eroding and in some cases this impacts on people's livelihood and homes. We will:
- Discourage development in undeveloped coastal areas if it would have adverse landscape impacts unless there are no alternatives available, (such as with established holiday parks) and development is essential.
  - Promote coastal protection measures where erosion could impact on people's livelihoods and homes where this aligns with the emerging Shoreline Management Plan 2 (long-term plan) and is financially feasible.

## **Coastal Zone**

- 18.21 Although the Dorset and East Devon Coast (Jurassic Coast) World Heritage site status is justified on account of geological importance UNESCO did note its landscape importance and the East Devon part of the site (for nearly all of its length) also lies in the East Devon. National planning guidance places a requirement on the Council to define the undeveloped coast and the Local Plan currently shows a Coastal Preservation Area. We intend to rely on existing evidence and investment programmes for the Shoreline Coastal Zone to manage this precious resource properly. Further investigation and assessments of the Coastal Zone for very specific areas may be undertaken should the need arise<sup>54</sup>.

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<sup>54</sup> Devon County Council (2006) "Undeveloped Coast" <http://www.devon.gov.uk/ldfpaper-coastalzone.pdf>

- 18.22 Circular 07/2009 on the protection of WHS advises that appropriate policies for the protection and sustainable use of WHSs including enhancement where appropriate, which supplement international and national policy and take account of the specific regional or local circumstances of a particular WHS, should be included in plans. Further that such policies should apply both to the site itself and, as appropriate, to its setting, including any buffer zone or equivalent. The WHS Management Plan<sup>55</sup> does not define a buffer zone for the site as the wider surrounding area is already afforded strong protection through existing systems of protective designation, in particular the Sites of Special Scientific Interest (SSSI), AONB and the Coastal Preservation Area (CPA).
- 18.23 The English Heritage guidance on the protection and management of WHS (footnote paragraphs 7.3 and 7.4 The Protection and Management of WHS in England CLG,EH and DCMS 2009 and paragraph 10 of CLG Circular 07/2009) advises that it is essential that appropriate policies enabling control of development in the setting of each WHS, including any buffer zone, in order to protect its Outstanding Universal Value, including authenticity and integrity, are included in plans.
- 18.24 Recent studies include assessment of the coastal zone area considerably further away from the shoreline than previously undertaken. This is to account for the potential increase in significant offshore and coastal energy schemes and the potential impacts caused.

### **Consultation Local Plan – Draft Strategy 38**

#### **The Undeveloped Coast in East Devon**

The Council will define an undeveloped coast policy with regard to views from both land and sea. Restrictive policy will place limits on development in this area that could damage this undeveloped/open status. This will be defined on the basis of visual openness and views to and from the sea. The boundary of the Coastal Preservation Area shown on the East Devon Local Plan will be used as a basis for informing area definition.

### **Rejected Options**

- 18.25 The Preferred Approach in respect of coastal zone protection is favoured over the following alternatives:
1. **Not Defining a Protection Area/Not Resisting Development** - to not define an area would leave the undeveloped coastline vulnerable to development and thereby could undermine one of the key qualities of East Devon.
  2. **Not Allowing Any Development** - if policy did not allow for any development of any shape or form it could prevent necessary works from happening (for example in respect of coastal protection) or exceptional cases where the social or economic benefits might outweigh adverse environmental impacts.

<sup>55</sup> Defra and Dcms (2009) “Dorset and East Devon Coast World Heritage Site Management Plan 2009 – 2014”

## Shoreline Management Plans and Coastal Protection/Erosion

- 18.26 Parts of the East Devon Coastline are subject to erosion. It is anticipated that climate change will create increasing pressure on coastal and estuarine environments through accelerating rates of sea level rise and an increased number of storms. If this occurs it will have implications for the cost and effort involved in protecting coastal communities from risk of flooding and coastal erosion. The potential impacts are not only in terms of individual properties at risk of loss or damage, but also the wider impacts on the local economy and local communities.
- 18.27 The Jurassic Coast World Heritage Site Management Plan highlights the fact that coastal erosion is part of the natural process and part of what helps define and justify the status of the coast. A key aim of the WHS Management Plan is 'protecting the outstanding universal value of the WHS by allowing natural processes to continue'. This plan seeks to balance this aim with the social and economic needs of our coastal communities.
- 18.28 Measures and policy for the management of East Devon's coastline is set out in the Shoreline Management Plan 2, which has recently been approved. This provides an objective, large scale assessment of the risks to people and the environment resulting from the evolution of the coast over the next 100 years. It is a non-statutory policy document for the planning and management of coastal defences. The broad approach of the SMP2 is to defend the centres of the main settlements along the coast and allow natural processes to continue in the rural areas. However, some properties in the towns are likely to be affected by coastal erosion in the medium (20-50 years) with substantially more likely to be affected in the longer term (50-100 years). Detailed policies for managing this change have been included in the proposed Development Management Policies.

### Consultation Local Plan – Draft Strategy 39 Coastal Erosion

Along the Jurassic Coast WHS, the outstanding universal value of the WHS will be conserved by allowing natural processes to continue, unless the safety and economic well being of any coastal community would be undermined, provided that the implications of this for the Jurassic Coast have been fully considered.

## Rejected Options

- 18.29 The Preferred Approach in respect of coastal erosion is favoured over the following alternative:
1. **Defining specific areas for defence work or proposing defences/means to secure their implementation** – this lies outside the remit of the local plan.

### **How we reached this Policy position:**

In the responses to the Preferred Approach, coastal management issues were identified as being important to our coastal communities and the representations of Natural England and the National Trust raised pertinent issues about what the policy should deal with. In view of these responses, national planning guidelines, the Draft Shoreline Management Plan 2<sup>56</sup> recently approved by East Devon and the challenges raised by climate change, it was felt that a policy relating specifically to coastal change should be included in the Local Plan.

It is clear from the draft Shoreline Management Plan 2 that there is a risk that a small number of properties in East Devon could be affected by coastal processes within the next 50 years. Whilst this may not occur within the lifetime of the plan, the nature of the geology is complex and changes are unlikely to occur in a measured, predictable fashion. Additional Development Management policies have therefore been proposed in the Development Management Chapter.

Policy has been redrafted to incorporate a key aim of the Jurassic Coast WHS Management Plan of ‘protecting the outstanding universal value of the WHS by allowing natural processes to continue’. However, there may be circumstances when this could conflict with the need to maintain the continuity of coastal communities so the policy seeks to balance these interests by requiring that evidence of the impact on the Jurassic Coast are taken into account.

### **Landscape and AONBs**

18.30 East Devon is blessed with landscape of exceptional quality, two thirds of the District falls within one of two AONB.

- The East Devon AONB falls wholly within East Devon and roughly covers the Southern third of the District.
- The Blackdown Hills AONB includes land in both Devon and Somerset and roughly covers the North-Eastern third of East Devon.

18.31 AONB enjoy, with National Parks, the highest level of landscape protection in Britain. They are, therefore, a national asset. It should be noted that a very small part of the Dorset AONB also falls in East Devon.

18.32 Under Section 85 of the Countryside and Rights of Way Act 2000 we have a statutory duty to produce a management plan for the AONBs in our District<sup>57</sup>. We will use these plans alongside the Local Plan to deliver our responsibility for due regard to these special landscapes and to help support sustainable development in these areas.

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<sup>56</sup> South Devon and Dorset Coastal Advisory Group (SDADCAG) (June 2011) “Shoreline Management Plan SMP2 Durlston Head to Rame Head” [http://www.sdadcag.org/docs/SMP/NTS\\_FINAL.pdf](http://www.sdadcag.org/docs/SMP/NTS_FINAL.pdf)

<sup>57</sup> East Devon and Blackdown Hills AONB (2009) “East Devon and Blackdown Hills AONB Management Plans (AONB Management Plans are due for review in 2014 which is consistent with the LCA for the District).” <http://www.eastdevonaonb.org.uk/index.php?page=aonb-management-plan>  
<http://www.blackdownhillsaonb.org.uk/Management-information-Management-Plan.html>

18.33 It is recognised that we need to accommodate development in our district , but should do this in a way that minimises adverse impacts, and enhances and improves landscapes that may have been degraded over the years. We will:

- Conserve and enhance the landscape of East Devon;
- Recreate and strengthen key landscape characteristics; and
- Ensure that new developments are appropriate in scale, form and design, are in keeping with their setting and take full account of the local natural and cultural heritage.

18.34 Feedback and evidence is set out below:

**What you said about Landscape and AONBs:**

- Invest in opportunities, particularly "Green Tourism" which secure the management of natural features and enhance their value for locals and visitors.
- Encourage improvements to well used destinations '(honey pots)' to manage quality and sustain likely increase in use (for example – Coastal Zones, Trinity Hill, Pebble bed Heaths, Beacon Hill)
- Avoid over development and ensure consultation with local residents and interest groups
- Invest in 'signage' to encourage use of countryside walks and improving movement patterns within settlements (GI). This may take the form of town maps printed and accessible on the Internet, etc
- Promote local agricultural practises and diversification – 'Local Produce'
- Conserve AONB and town boundaries

**What the sustainability appraisal and other evidence tells us about Landscape and AONBs:**

- Without specific proposals being set out in the Issues and Options report for Landscape and AONB treatment, the Sustainability Appraisal makes no detailed comment. However, the Council's Vision and Objectives (in the Issues and Options report) advocates the protection of natural resources, and the promotion of a sustainable countryside.

18.35 Emphasis will be placed on conserving and enhancing landscape assets of greatest importance for East Devon; in particular the AONBs. This approach will not mean we resist development automatically or take the view that landscape changes cannot occur but, especially in the more sensitive and important locations, we will expect high quality development that is in keeping with its landscape setting.

18.36 A Landscape Character Assessment (LCA)<sup>58</sup> of East Devon was undertaken in 2008, which identifies and describes distinctive landscape character types throughout the district. This information will be used to ensure that development proposals reflect the distinctive character, qualities and sensitivities of the area, maintaining local identity. The Council will use this and tools such as Historic Landscape Characterisation

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<sup>58</sup> The East Devon Landscape Character Assessment can be viewed at [http://www.Eastdevon.gov.uk/plg\\_lcawhole.pdf](http://www.Eastdevon.gov.uk/plg_lcawhole.pdf)

(HLC) to aid decision making and try to identify those aspects of a landscape that have been lost, undermined or require conservation and enhancement. The Council will ensure that landscape improvements are secured for the long-term through the development process. We will use the following documents and work areas to judge proposals affecting the landscape:

- European Landscape Convention – compliance with ‘local distinctiveness’ and a need to consult widely with local people to ascertain views;<sup>59</sup>
- Natural England – National Character Areas (due 2011/2012)<sup>60</sup>.
- Regional Study on Wind Farms (Cornwall, Devon and Dorset) due for completion by CLG by end 2010-06-15<sup>61</sup>.
- East Devon and Blackdown Hills AONB and East Devon District Landscape Character Assessment & Management Guidelines (2008)<sup>62</sup>.
- Historic Landscape Characterisation (DCC)<sup>63</sup>.
- East Devon Biodiversity Action Plan<sup>64</sup>.
- Sport and recreation studies.
- Exeter Area and East Devon Growth Point - Green Infrastructure Study (April 2009) and Strategy (December 2009)<sup>65</sup>.
- East Devon and Blackdown Hills AONB Management Plans (AONB Management Plans are due for review in 2014 which is consistent with the LCA for the District)<sup>66</sup>.
- World Heritage Site Jurassic Coast Management Plan<sup>67</sup>.
- Dorset & East Devon Coastal Advisory Group – Shoreline Management Plan<sup>68</sup>.

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<sup>59</sup> Council of Europe (2000) “European Landscape Convention”

[http://www.coe.int/t/dg4/cultureheritage/heritage/Landscape/default\\_en.asp](http://www.coe.int/t/dg4/cultureheritage/heritage/Landscape/default_en.asp)

<sup>60</sup> Natural England (1996) Updated in 2005 and due for further revisions 2011/2012 National Character Areas <http://www.naturalengland.org.uk/ourwork/landscape/englands/character/areas/default.aspx>

<sup>61</sup> (Cornwall, Devon and Dorset) due for completion by CLG by end of 2010-06-15 (2010) National Character Areas <http://www.northumberland.gov.uk/idoc.ashx?docid=b2bbbb8f-fde9-41af-bc8d-85442d4d8b6f&version=-1>

<sup>62</sup> East Devon and Blackdown Hills AONB and East Devon District Council (2008) “East Devon and Blackdown Hills AONB and East Devon District Landscape Character Assessment & Management Guidelines”. [http://www.eastdevon.gov.uk/planning-landscape\\_character\\_assessment](http://www.eastdevon.gov.uk/planning-landscape_character_assessment)

<sup>63</sup> Devon County Council (2005) “Historic Landscape Characterisation”

[http://www.devon.gov.uk/index/environment/historic\\_environment/landscapes/landscape-characterisation.htm](http://www.devon.gov.uk/index/environment/historic_environment/landscapes/landscape-characterisation.htm)

<sup>64</sup> Natural England (1994) “East Devon Biodiversity Action Plan”

<http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/ukactionplan.aspx>

<sup>65</sup> Exeter Area and East Devon Growth Point (2009) “Green Infrastructure Study and Strategy” [http://www.eastdevon.gov.uk/planning-ldf\\_greeninfrastructure](http://www.eastdevon.gov.uk/planning-ldf_greeninfrastructure)

<sup>66</sup> East Devon and Blackdown Hills AONB (2009) “East Devon and Blackdown Hills AONB Management Plans” (AONB Management Plans are due for review in 2014 which is consistent with the LCA for the District) <http://www.eastdevonaonb.org.uk/index.php?page=aonb-management-plan>  
<http://www.blackdownhillsaonb.org.uk/Management-information-Management-Plan.html>

<sup>67</sup> DEFRA and Department of Culture, Media and Sport (2009-2014) “World Heritage Site Jurassic Coast Management Plan”  
[http://www.jurassiccoast.com/downloads/WHS%20Management/jurassic\\_coast\\_plan\\_lowres.pdf](http://www.jurassiccoast.com/downloads/WHS%20Management/jurassic_coast_plan_lowres.pdf)



- 18.37 The above various documents and programmes will be monitored and assessed to ensure matters of relevance and significance to East Devon District are addressed in a timely and effective manner and opportunities to enhance landscape are exploited. Where there are opportunities to update information and influence these and other policy and national investment programmes we will play our part in developing appropriate action plans or DPDs to achieve this.
- 18.38 National Planning Policy will be referred to when considering applications for major development in AONBs. Within AONBs, consideration will also be given to proposals which serve to facilitate delivery of the Statutory AONB Management Plans and their Objectives and are desirable for the understanding and enjoyment of the area.

#### **Consultation Local Plan – Draft Strategy 40** **Landscape Conservation and Enhancement and AONBs**

Development will need to be undertaken in a manner that is sympathetic to and helps conserve and enhance the quality and local distinctiveness of the natural and historic landscape character of East Devon, in particular in Areas of Outstanding Natural Beauty.

Development will only be permitted where it:

1. Conserves and enhances the landscape character of the area; and
2. does not undermine landscape quality; and
3. Is appropriate to the economic, social and well being of the area.

When considering development in or affecting AONBs, great weight will be given to conserving and enhancing their natural beauty.

#### **Rejected Options**

- 18.39 The Preferred Approach in respect of landscape protection is favoured over the following alternatives:
1. **Resisting all Development in Sensitive Locations** - This approach would fail to recognise the evolving nature of landscape and the fact that some development and change is required for social and economic progress and can provide/enable environmental benefits.
  2. **Taking Little or No Account of Landscape Importance** - the landscape quality of East Devon is of national importance and a fundamental asset to the District. To not afford it protection would be contrary to clear national policy and also would undermine a key asset of East Devon.
  3. **Not Endorsing a Landscape Character Assessment Approach** - Landscape Character Assessment is endorsed through national guidance and to not adopt this approach would run contrary to such advice.

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<sup>68</sup> South Devon and Dorset Coastal Advisory Group (2011) "Shoreline Management Plan"  
<http://www.environment-agency.gov.uk/research/planning/104939.aspx>

4. **Making Local Area Landscape Designations** - Local Landscape Designations are contrary to national guidance. Other location based planning policies should provide specific requirements to conserve and enhance. Landscape Character Assessments will support the 'All Landscapes Matter' approach to inform change in the future.

## **Biodiversity and Geological Protection**

18.40 East Devon has an amazing diversity of wildlife habitats and geology. It contains a range of internationally, nationally, regionally and locally important wildlife and geological sites, including:

- 2 Special Protection Areas one of these - the Exe Estuary - is also a Ramsar Site.
- 4 Special Areas of Conservation.
- 1 National Nature Reserve.
- 25 Sites of Special Scientific Interest.
- 8 Local Nature Reserves.
- 270 County Wildlife Sites.
- 21 Regionally Important Geological Sites (RIGS).

18.41 Our landscape contains a distinctive network of species-rich hedgerows, woodlands and river valleys linking up designated sites and Biodiversity Action Plan habitats. Priority UK Biodiversity Action Plan species found in the District include dormouse, nightjar, Dartford warbler and a range of bat species. Protective designations are important not just for the sake of these species but because such assets add to people's quality of life and attract tourists to the District. To ensure we retain and enhance our biodiversity we will:

- Conserve and enhance the most valued habitats.
- Only permit developments that would cause no harmful impacts to important habitats (and the species they support), or that would include measures to mitigate or offset such impacts.
- Promote habitat creation, including provision of major new green spaces for wildlife and people to use.

18.42 Many of the District's most important habitats are damaged or threatened by under-grazing and lack of active management, land use change and fragmentation, recreational pressure and by future climate change. Key losses have included reduction of open habitats such as lowland heath to scrub and rank vegetation. In the wider landscape, hedgerow removal and insensitive conversion of rural buildings can impact on species such as dormice and bats.

18.43 We also need to enable wildlife and habitats to adapt to future climate changes. Many habitats in the District which used to be widespread are now broken up into small pockets. This affects the ability of wildlife and habitats to adapt to climate change and there is therefore a need to expand and reconnect existing areas and to restore habitats.

- 18.44 The South West Regional Biodiversity Partnership Nature Map provides a clear strategic picture of areas within the District with high potential for re-creation of Biodiversity Action Plan habitats (Strategic Nature Areas). Strategic Nature Areas within the District include areas suitable for the re-creation of lowland heath, native woodland, coastal and floodplain grazing marsh, neutral grassland and purple moor-grass and rush pasture.
- 18.45 The internationally designated sites (SPAs, SACs and Exe Estuary Ramsar site), nationally designated sites (SSSIs) and statutorily protected wildlife species within the District all have statutory protection. As these sites are already legally protected the Local Plan will not contain Policies specifically relating to them. The Dorset and East Devon Coast WHS extends from Orcombe Point at Exmouth along the East Devon Coast to Lyme Regis and then on to Studland in Dorset and is designated for its outstanding geology representing 185 million years of the Earth's history. At the local level there are eight local nature reserves, 270 County Wildlife Sites and 21 Regionally Important Geological sites.
- 18.46 Local wildlife sites, such as Local Nature Reserves and wildlife corridors, are also important and are highly valued at a local level throughout the District. Within our built-up areas, 'community greenspaces' are essential 'green lungs' which provide wildlife habitats and formal and informal recreation spaces. Phear Park and the Valley Parks in Exmouth, the Axe Estuary Wetlands, the Byes in Sidmouth are all examples of community greenspaces which, whilst different in character, contribute hugely to local biodiversity and residents' quality of life.

### **Habitat Regulations and Habitat Creation**

- 18.47 The East Devon Heaths Special Protection Area (SPA) is a network of heathland sites, which are designated for their ability to provide a habitat for internationally important breeding populations of nightjar and Dartford warbler. The Exe Estuary SPA is designated for its internationally important populations of birds. The River Axe Special Area of Conservation (SAC) is designated for its habitat provision, particularly for vegetation and fish species. Sidmouth to West Bay SAC is a coastal strip designation, focusing on sea cliff, scree and drift line vegetation. Beer Quarry and Caves SAC is designated for the existence of 3 bat species, and the last Devon Pebblebed Heaths SAC (same areas as the SPA) is designated in recognition of its wet and dry heathland vegetation, and for the Southern Damselfly. These areas are protected by the Habitats Directive (EC Directive 92/43/EEC on the Conservation of Natural and Semi-Natural Habitats and of Wild Fauna and Flora) and the Habitats Regulations (The Conservation (Natural Habitats &c.) Regulations 1994). Under these Regulations East Devon District Council has a duty to assess whether there is a risk of any plan or proposal having a significant impact on the integrity of the SPA or SAC.
- 18.48 International and national legislation and policy already provides statutory protection for, and comprehensive guidance on the management of valued biodiversity and geological assets. We will apply these safeguards carefully together with the use of continued Local Plan policies, to conserve these precious assets.

18.49 Feedback and evidence is set out below:

**What you said about Wildlife Conservation:**

- Wildlife protection is important, for its own sake, because it enriches residents' lives and because it attracts visitors.
- Development which would negatively impact upon wildlife or habitats should not be permitted and, where damage is unavoidable, mitigation measures should be implemented

**What the sustainability appraisal and other evidence tells us about Wildlife Conservation:**

- The Habitat regulation assessment work we have undertaken shows that development in a number of East Devon towns could adversely impact on protected sites. To be acceptable there will be a need for mitigation measures to offset adverse impacts that could result.
- East Devon is a district of significant biodiversity and nature conservation value - there are 25 SSSIs, 4 SACs and 2 SPAs, as well as a number of non-designated sites which hold high ecological value, including broadleaved woodland, rivers and streams and maritime cliffs and slopes.
- The District is a nationally important area for winter roosting bird species in areas such as the Axe and Exe Estuaries.

18.50 The Council has formed the view, after receiving advice from Natural England (the government agency responsible for the promotion of wildlife), that there is a risk that any proposal for residential development of at least one net additional dwelling within 5 km (3 miles) of the East Devon Heaths SPA or the Exe Estuary SPA boundary is likely to have a significant effect. A particular concern raised by Natural England is that new housing development may have an adverse effect on the SPAs; for example an increase in recreational activity and dog walking may disturb the ground-nesting birds on the Heaths or roosting or feeding birds on the Exe Estuary.

**Consultation Local Plan – Draft Strategy 41  
Nature Conservation and Geology**

**All development proposals will need to:**

1. Protect the biodiversity value of land and buildings and minimise fragmentation of habitats.
2. Maximise opportunities for restoration, enhancement and connection of natural habitats.
3. Incorporate beneficial biodiversity conservation features.

Development proposals that would cause a direct or indirect adverse effect to internationally and nationally designated sites will not be permitted unless they are in the over-riding public interest and:

- a) They cannot be located on alternative sites that would cause less or no harm.
- b) The public benefits of the development clearly outweigh the impacts on the features of the site and the wider network of natural habitats.

c) Prevention, mitigation and compensation measures are provided.

Development proposals where the principal objective is to conserve or enhance biodiversity or geodiversity interests will be supported in principle.

Where there is reason to suspect the presence of protected species applications should be accompanied by a survey assessing their presence and, if present the proposal must be sensitive to, and make provision for, their needs.

Where development or the occupants of development could lead to adverse biodiversity impacts we will seek mitigation measures and contributions to allow for measures to be taken to offset adverse impacts and to create new habitats. This will be particular importance where development could impact upon 'European Designated Sites'. Where designated sites might be affected there will be a need for Appropriate Assessment in line with Conservation and Species Habitat Regulation requirements. Mitigation measures will be required if harmful impacts are predicted or could arise.

## Rejected Options

18.51 The Preferred Approach in respect of biodiversity and wildlife protection and enhancement is favoured over the following alternatives:

1. **Not complying with Habitat Regulations** - This is not an option as it is a legal requirement to comply with habitat regulations.
2. **Not providing over-arching policy conserving and enhancing biodiversity** – absence of an over-arching policy would suggest a lack of commitment to protect our outstanding environment.

## Design and the Built Heritage

18.52 The underlying geology of East Devon and the agriculture it has supported, have ensured we have an interesting range of local building materials which have been used traditionally to give an identifiable built heritage of exceptional quality. Regrettably, more recent development has often been of lesser quality, with little reference to the place. We see local distinctiveness, in building materials and form, as essential to the quality and appeal of East Devon and we will:

- Promote high quality locally distinctive design standards.
- Value, conserve and enhance our historic built environment.
- Require sustainable construction techniques to be included in projects

## Design and Local Distinctiveness in the Built Environment

18.53 Feedback and evidence is set out below:

### **What you said about Design and the Built Heritage:**

- A consistent message has come through of supporting local distinctiveness in design.
- Approximately one third of Towns and Parishes have produced Design Statements which identify the characteristics of their settlement and give design guidance.

### **What the sustainability appraisal and other evidence tells us about Design and the Built Heritage:**

- Recent housing developments have often been unsympathetic to local vernacular styles and materials, for example bungalows built in coastal towns. In Honiton and Exmouth, where particularly substantial residential growth has been experienced, a large number of newer properties can be seen which often pay little respect to traditional local styles. Making places that are attractive to live in, work in and visit is an important part of the sustainability spectrum.

18.54 Buildings have traditionally been built from the materials that are close to hand and available. The fact that the geology of East Devon varies so much has resulted in a very broad range of materials being used in the construction process. In some cases availability of materials and therefore their use was very localised, for example Beer stone, and this has meant that settlements can vary greatly in their traditional look and feel.

18.55 In past years the cost and difficulty of transporting materials was so high that it was only the finest and most expensive buildings that were built from non-local supplies. As transport costs have gone down, use of non-traditional materials has expanded and standardisation of materials and their production has occurred. We feel that as a consequence the aesthetic quality of buildings and the built environment has suffered. Traditional materials can be, but not always are, more expensive than modern alternatives. However, over the life span of a building and given the overall costs involved in construction, such differences are often marginal or negligible and are outweighed by the long term visual and character benefits.

18.56 We wish to see the use of traditional materials and methods in buildings as we see this as a means to help define and enhance the quality of the built environment. The natural environment of East Devon is outstanding: it warrants matching high quality standards in the built environment. We want to ensure that, in the future, buildings in East Devon will make obvious use of local materials in sympathetic and traditional styles and forms. This emphasis on local distinctiveness will be a challenge to 'standardised' design approaches and 'off the peg' solutions. It does not mean that contemporary or modern designs cannot be used but it does require that designers think far more about how local materials and local traditions should inform and be integral to their work.



## **Consultation Local Plan – Draft Strategy 42**

### **Local Distinctiveness in the Built Environment**

We will emphasise local distinctiveness in the development process to ensure that East Devon's towns and villages retain their intrinsic physical built qualities or where despoiled seek to have these qualities reinstated, through good design. Use of local materials and local forms and styles will be essential to this distinctiveness.

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

### **Rejected Options**

18.57 The Preferred Approach in respect of local distinctiveness in the built environment is favoured over the following alternative:

1. **To not seek high quality locally distinctive development** - this would undermine the value of the built environment which is one of the key appeals of East Devon. It would fail to recognise the importance of part of what makes East Devon the place it is.

### **Buildings and Building Conservation**

18.58 East Devon has nearly 4,500 buildings and structures that are formally listed as of Special Architectural or Historic Interest. It shows that when well built, using quality local materials, buildings can last for centuries and adapt, within reason, to meet changing local needs and lifestyles.

18.59 Feedback and evidence is set out below:

#### **What you said about Buildings and Building Conservation:**

- The historic and architectural qualities of buildings in a settlement, of whatever size, help people to feel a sense of familiarity, belonging, and pride in the place. Local styles and materials of buildings help to identify the place and what is special about it.

#### **What the sustainability appraisal and other evidence tells us about Buildings and Building Conservation:**

- There is significant archaeological heritage within East Devon, both land and shore-based. There are 188 Scheduled Ancient Monuments in East Devon and 4,408 listed buildings (this represents 1 for every 28.5 people, which is over four times the England average). Most are privately owned residential buildings and most are in good condition, although a significant minority have defects and signs of deterioration.

18.60 We regard it as essential that we conserve and enhance the historic built heritage of East Devon. The traditional buildings of East Devon bring pleasure to residents and visitors alike, they form a key part of the tourism appeal of the District and help define the identity of East Devon. We already have strong national guidance and legislation that protects listed buildings. The Council continues to survey the Listed Building stock of the District and are currently undertaking revisions to the Conservation Area

Appraisals. We will continue to apply existing legislation and guidance in the most effective way to protect the built environment.

- 18.61 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:
1. Its influence on the character of the environment and an area's sense of place.
  2. Its potential to be a catalyst for regeneration in an area, in particular through leisure, tourism and economic development.
  3. The stimulus it can provide to inspire new development of imaginative and high quality design.
  4. The re-use of existing fabric, minimising waste.
  5. Its mixed and flexible patterns of land use that are likely to be, and remain sustainable.

**Consultation Local Plan – Draft Strategy 43**  
**The Built Heritage and Building Conservation**

The physical and cultural heritage of the district 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 local communities to produce or update Design Statements, and the incorporation of heritage asset assessment into further Strategy preparation such as that proposed for Green Infrastructure.

**Rejected Options**

- 18.62 The Preferred Approach in respect of building conservation is favoured over the following alternatives:
1. **To not conserve and enhance the built environment** - this would undermine the value of the built environment which is one of the key appeals of East Devon. It would fail to recognise the importance of part of what makes East Devon the place it is.

**TO MAKE COMMENTS ON CHAPTER 18: OUR  
OUTSTANDING NATURAL AND BUILT  
ENVIRONMENT visit:  
[www.eastdevon.gov.uk/draftlocalplan18](http://www.eastdevon.gov.uk/draftlocalplan18)**

## 19 Delivery and Infrastructure Provision

### Provision of Social, Physical and Community Infrastructure

- 19.1 Development of any kind can place demands on existing infrastructure and generate a need for new infrastructure. When new homes are built their occupants will need to use roads and sewers, new play areas may be important, community halls or new school places may be needed. In some cases private sector business will provide facilities and infrastructure, because there is money to be made in doing so, but for many facilities this will not be the case.
- 19.2 In the past, development in some parts of East Devon, particularly new house building, has not always been accompanied by the timely provision of social, physical and community infrastructure needed to ensure we have attractive and successful places and communities. We need to ensure this does not happen in the future. The Local Plan will play a key role in identifying infrastructure requirements, ensuring that provision and investment by infrastructure providers is co-ordinated with development and that efficient and effective use is made of existing infrastructure. We will also ensure appropriate contributions are secured from developers. We will produce an Infrastructure Delivery Plan which will provide clarity about what infrastructure is required, when it should be delivered and by whom and how it should be funded.
- 19.3 Feedback and evidence is set out below:

#### **What you said about Delivery and Infrastructure Provision:**

- A consistent message coming through from consultation events was the need to ensure infrastructure was provided alongside new development.
- In some areas existing infrastructure is insufficient to meet existing demand and additional development could not be accommodated without extra infrastructure provision.

#### **What the sustainability appraisal and evidence tells us about delivery and infrastructure provision:**

- The Social and Community Infrastructure model highlights areas of infrastructure deficiency and also areas where supply exceeds demand.

### Understanding Other Organisations' Proposals and Plans

- 19.4 Coordinating planning policy with the investment strategies, policies and proposals of other bodies is a key element of effective planning. A task over the coming months will be to ensure close liaison with infrastructure providers in the public, private and voluntary sectors so that we understand more fully what they are seeking to do and so that they understand more fully our plans and proposals. Creating a consistency of approach will be critical to making best use of limited public resources.

## **Developer Contributions and the Community Infrastructure Levy**

- 19.5 It has been long established practise for Councils to seek contributions from developers in the form of facilities, infrastructure or financial contributions to address impacts arising from development. Contributions have historically been collected under what are called 'Section 106 Agreements' (after Section 106 of the Town and Country Planning Act 1990).
- 19.6 The Government will introduce the Community Infrastructure Levy (CIL). This allows local authorities to raise funds from developers undertaking new building projects in their area. The money can be used to fund a wide range of infrastructure that is needed as a result of development. This includes transport schemes, flood defences, schools, hospitals and other health and social care facilities, parks, district heating schemes, green space and leisure centres as well as local community facilities such as village halls.
- 19.7 The Council is committed to introducing the Levy alongside the Local Plan as a key means of securing the delivery of essential infrastructure improvements. The Levy will operate alongside tradition Section 106 Agreements as a means of collecting developer contributions. The Council will set out in the Infrastructure Delivery Plan which items of infrastructure are expected to be funded through the Levy and which will be secured through Section 106 Agreements. This will insure that there is no double charging for the same item of infrastructure.
- 19.8 The critical document in introducing the Levy is the publication of a Charging Schedule. This will set out the charging rates (on a £ per M<sup>2</sup> basis) for different types of development, potentially with different rates for different areas within the District. The Charging Schedule needs to be underpinned by a robust evidence base on the impact of proposed Levy rates on development viability. It is intended that the Local Plan the Levy Charging Schedule will be the subject of a joint Examination in Public.

## **Partnership Working**

- 19.9 The Council will work with partner organisations, responsible for transport provision, education, health, social service and cultural and recreation provision to understand how we can best ensure that East Devon has the right level of infrastructure to create and sustain thriving communities. Through partnership working we will seek to balance:
- Provision of new housing in response to current/potential surplus future infrastructure provision.
  - Provision of new infrastructure to match demands arising from future population changes and also to address current shortfalls.

## **Infrastructure Provision**

- 19.10 The infrastructure needed to support new development will often be of a small scale and may be localised on or close to a particular development site. The Government is currently consulting on establishing neighbourhood funds. Here a minimum percentage of the receipts levied from development in an area will be passed to the relevant Parish or Town Council to provide infrastructure to support the development of the area. There are cases where we will also identify strategic infrastructure that is needed for large parts of the district and potentially areas beyond it. Residents of new development across East Devon (and beyond) can be expected to have impacts on larger scale (or strategic) infrastructure services and facilities. For example anyone driving on East Devon's roads will add extra traffic to roads and to road junctions. The impacts of an individual additional motorist might be of little relevance, but when the impacts of lots of new residents and their driving are added together they may add so much pressure and use that capacity levels of roads and junctions are exceeded.
- 19.11 The Council will identify major infrastructure schemes that are needed to support the whole of East Devon.
- 19.12 Under the CIL Regulation (under consultation in late 2011) it might be that affordable housing becomes in part of full CIL funded. Current national consultation is assessing whether affordable housing should be provided for through Section 106 agreements or the Community Infrastructure Levy or a combination of both. If CIL regulations change the Council will review the need for policy amendments.

### **Consultation Local Plan – Draft Strategy 44**

#### **Infrastructure Delivery**

The Council will produce an Infrastructure Delivery Plan to set out how the implementation of Local Plan policies and proposals will be supported through the timely delivery of infrastructure improvements. It will be produced alongside the Local Plan and form part of the Council case at Submission and Examination. It will detail local and strategic schemes and set how much they will cost, who will lead on provision and who the relevant partners will be. Developer contributions will be sought to ensure that the necessary infrastructure improvements are secured to support the delivery of development and mitigate any adverse impacts. The Council will introduce the CIL alongside the Local Plan. The Levy Charging Schedule will be the subject of a joint examination with the Local Plan. The Infrastructure Delivery Plan will set out which items of infrastructure are expected to be funded through the Levy and which will be secured through Section 106 agreements.

Through Section 106 Agreements and negotiations over site development and where otherwise not met through alternative committed schemes or proposals the Council will ensure that:

1. Infrastructure requirements that arise as a direct consequence of developments are met in full and to serve the needs of the proposal and occupants and users.
2. The loss of, or adverse impacts on, any significant amenity or resource present on the site prior to the development is offset by the provision of alternative facilities that are of equal or greater value.

Infrastructure provision should be phased to meet development and failure to provide or absence of relevant infrastructure will be grounds to justify refusal of permission.

### **Rejected Options**

19.13 The following alternatives to the above preferred approach have been rejected:

1. **Not seeking developer contributions** - this approach would place the onus on the public and voluntary sector paying for all facilities. Money is not going to be available through the public purse to pay for provision.
2. **Relying on Section 106 Agreements only** - Section 106 monies will probably continue to be made available but the likelihood is that such funding will be for local provision only that is specifically linked to a proposal and not for strategic infrastructure provision.
3. **Not taking into account viability considerations** - developers will not build unless there is a profit to be made. It is appropriate to ensure that we secure relevant contributions, but not to prejudice development that we need, simply on viability grounds.



**TO MAKE COMMENTS ON CHAPTER 19:  
DELIVERY AND INFRASTRUCTURE PROVISION  
visit:  
[www.eastdevon.gov.uk/draftlocalplan19](http://www.eastdevon.gov.uk/draftlocalplan19)**



## 20 Monitoring

### How we Measure the Impacts of Policy

- 20.1 Monitoring is an essential component of the planning policy process. All policies we produce will be designed around recognition that there is an issue or consideration that needs to be addressed or a set of circumstances to which the Council will need to respond. We will need to understand and set out what outcomes we wish to see from the implementation or application of any policy, and then we will need to see if the policy has been successful. Is it achieving what we wanted it to achieve and why and how, or might alternatives (or having no policy) have achieved equal or better results?
- 20.2 Monitoring is a key means by which we will be able to assess the success or otherwise of any policy or policies. At present we produce an Annual Monitoring Report and this provides details of the levels, types and locations of development that are occurring in East Devon. The Annual Monitoring Report provides significant detail on levels of new homes being built. Monitoring will specifically look at the success and implementation of strategic policies of the plan.

### Five Year Land Supply and Sub-Housing Areas

- 20.3 Councils are required to show that they have a 'Five Year Land Supply' available in their area. This means that after taking into account overall strategic requirements for housing and then subtracting what has been built already. Is there sufficient land available 'in the system' and likely to be built (to include sites allocated or with permission or under construction or otherwise identified) to meet the residual future requirements for at least the next five years?
- 20.4 In East Devon we will work to two sub-areas for five year land provision:
1. **The West End** - to include Cranbrook and other big strategic housing sites on the Western side of the District. On current assessment (under Devon Structure Plan housing 'requirements') we have less than five years' land supply in this area.
  2. **The Rest of East Devon** - that is, everywhere else within our District. On current assessment (under Devon Structure Plan housing 'requirements') we have considerably more than five years' land supply.

**TO MAKE COMMENTS ON CHAPTER 20:  
MONITORING visit:**

**[www.Eastdevon.gov.uk/draftlocalplan20](http://www.Eastdevon.gov.uk/draftlocalplan20)**



## **PART TWO – DEVELOPMENT MANAGEMENT POLICIES**

This part of the New Local Plan is specifically concerned with the local or development management policies. These policies provide more detail on the implementation and application of the strategic policies in the plan. Any planning application that is to be assessed will be done so under the strategic policies in Part One of the Plan and also these development management policies of Part 2 of the Plan.

However, through a Neighbourhood Plan (see part 3 of this plan) a Parish Council or relevant neighbourhood group can produce a local plan for their area that supersedes some or all of the policies in this part of the local plan. Respondents to the plan may wish to comment on the part of the plan they consider policies should fall within, if they should be strategic or non-strategic.

All planning applications submitted to the Council must meet the requirements of the Council's adopted Validation Checklist with regard to the information and plans required to support the application. Applications that do not meet these requirements will not be registered for consideration. The validation checklist can be viewed on the Council's web-site at:

[http://www.eastdevon.gov.uk/index/planning\\_services/development\\_control\\_planning/validation\\_checklist.htm](http://www.eastdevon.gov.uk/index/planning_services/development_control_planning/validation_checklist.htm)





## **21 The Development Management Policies of the Local Plan**

- 21.1 The development management policies of the plan provide finer grain policy detail and are particularly relevant in the determination of planning applications. Most of the policies in this Part 2 of the proposed new Local Plan have been taken from/informed by the policies of the existing adopted East Devon Local Plan. To allow users to compare existing Local Plan policies to proposed New Local Plan policies the policy numbers have, for the most part, been retained. Retention of the same policy numbers in the new plan, at this stage of work, will ensure that anyone reviewing or commenting on the new plan can refer to the existing Local Plan Proposals Maps (include town and village insets) to see boundary areas to which policies apply and which they can comment on/or propose amendments to.

### **Built-up Area Boundaries and the Countryside**

- 21.2 The first part of the Local plan sets out policy for development within and beyond Built-up Area Boundaries.
- 21.3 Inside the boundaries many forms of development, subject to consideration of other policies of the plan, will be allowed and encouraged. The Built-up Area Boundaries seek to manage the scale, levels and distribution of proposed development in general and especially new housing and ensure development occurs in line with strategic objectives.
- 21.4 The boundaries have been drawn to typically follow physical features but, particularly in villages, do not include all development or facilities. In some cases areas of land or buildings, for example peripheral playing fields or farm complexes, are excluded from Built-up Area Boundaries because if they became redundant it could lead to the development of inappropriate large suburban housing estates or other developments that are not compatible with strategic policies. In a number of cases Built-up Area Boundaries cut across the rear gardens of properties, rather than following defined garden areas or property boundaries. This is to ensure that inappropriate 'backland' development does not occur and lead to urban sprawl on the edge of settlements. Furthermore the rear gardens of properties, especially large gardens, can be more akin to the open countryside in character, rather than the built environment of towns and villages and also can provide a 'soft' landscape edge to settlements.

#### **Policy S4 - Development within Built-Up Area Boundaries**

Built-up Area Boundaries are defined on the Proposals Map around the settlements of East Devon that are considered appropriate through strategic policy to accommodate growth and development. Within the boundaries development will be permitted if:

1. It would be compatible with the character of the site and its surroundings and in villages with the rural character of the settlement.
2. It would not lead to unacceptable pressure on services and would not adversely affect risk of flooding.
3. It would not damage, and where practical, support promotion of wildlife, landscape, townscape or historic interests.
4. It would not involve the loss of land of local amenity importance or of recreational value;
5. It would not impair highway safety or traffic flows.
6. It would not prejudice the development potential of an adjacent site.

- 21.5 A key objective of the Local Plan is to conserve and enhance the environment, the landscape, historic character and archaeological value and its wildlife, agricultural, recreational and natural resource value of countryside areas. Development in open countryside outside the defined boundaries will be resisted, unless on the merits of the particular case, there is a proven agricultural, forestry or horticultural need or it will meet a community need that is not, or will otherwise not be, met, or there is another clear policy justification.

#### **S5 – Development in the Countryside**

The countryside is defined as all those parts of the plan area outside the Built-up Area Boundaries for towns and villages and outside of site specific allocations shown on the Proposals Map. Development in the countryside will only be permitted where it is in accordance with a specific Local Plan policy that explicitly permits such development and where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located, including:

1. Land form and patterns of settlement.
2. Important natural and manmade features which contribute to the local landscape character, including topography, traditional field boundaries, areas of importance for nature conservation and rural buildings.
3. The adverse disruption of a view from a public place which forms part of the distinctive character of the area or otherwise causes significant visual intrusions.

#### **Green Wedges**

- 21.6 One of the potential results of ‘creeping’ development could be the coalescence of adjacent or neighbouring settlements, villages or towns. To prevent such coalescence it is important that open land between settlements is retained thus helping them maintain their separate identities, their landscape settings and to avoid the creation of unrelieved development. The areas subject to the policy are defined on the Proposals Map and comprise:

- i) Land to the East of Exeter and South of the A30 and an area to the South of Poltimore.
- ii) Land adjoining the Exe estuary and West of the A376 North of Lympstone to the Royal Marines site and North of Exton to Marsh Barton.
- iii) Land to the North and North East of Exmouth.
- iv) Land between Budleigh Salterton and Knowle.
- v) Land between Seaton and Colyford and Colyford and Colyton.
- vi) Land separating the villages of Rockbeare and Whimble from the new community site.

#### **S6 - Development in Green Wedges**

Within Green Wedges, as defined on the Proposal Map, development will not be permitted if it would add to existing sporadic or isolated development or damage the individual identity of a settlement or could lead to or encourage settlement coalescence.

#### **Design Standards**

- 21.7 Promoting high quality and locally distinctive design is of critical importance. We will seek to ensure the highest design standards to reflect local traditions and use of local materials. The varied geology of East Devon has helped to ensure we have a diverse range of traditions and style in development and we see it as essential that traditional vernacular is retained. This does not mean that building should not meet sustainability credentials and care with siting, orientation and layout of new buildings can help with promotion and utilisation of sustainable technologies.
- 21.8 In some circumstances, for instance within Conservation Areas, where design considerations are of especial importance in determining whether development should be permitted the District Council may require the submission of a detailed planning application rather than an outline application.

#### **D1 - Design and Local Distinctiveness**

In order to ensure that new development, including the refurbishment of existing buildings to include renewable energy, is of a high quality design and locally distinctive, a design statement setting out the design principles to be adopted should accompany proposals for new development. Proposals should have regard to Village and Design Statements and other local policy proposals, including Neighbourhood Plans, whether adopted as Supplementary Planning Guidance or promoted through other means.

Proposals will only be permitted where they:

1. Reinforce the key characteristics and special qualities of the area in which the development is proposed.
2. Ensure that the scale, massing, height, fenestration and materials of buildings relate well to their context.
3. Do not adversely affect:
  - a) The distinctive historic or architectural character of the area.

- b) The urban form, in terms of significant street patterns, groups of buildings and open spaces.
  - c) Important landscape characteristics, prominent topographical features and important ecological features.
  - d) Trees worthy of retention.
  - e) The amenity of occupiers of adjoining residential properties.
  - f) The amenity of occupants of proposed future residential properties, with respect to access to open space, storage space for bins and bicycle and prams and other uses, these considerations can be especially especially in respect of proposals for conversions into flats.
4. Have due regard for important aspects of detail and quality and should incorporate:
- a) Secure and attractive layouts with safe and convenient access for the whole community, including disabled users.
  - b) Measures to create a safe environment for the community and reduce the potential for crime.
  - c) Use of appropriate building materials and techniques respecting local tradition and vernacular styles as well as, where possible, contributing to low embodied energy and CO<sub>2</sub> reduction.
  - d) Necessary and appropriate street lighting and furniture and, subject to negotiation with developers, public art integral to the design.
  - e) Features that maintain good levels of daylight and sunlight into and between buildings to minimise the need for powered lighting.
  - f) Appropriate 'greening' measures relating to landscaping and planting, open space provision and permeability of hard surfaces.
5. Incorporate measures to reduce carbon emissions and minimise the risks associated with climate change. Existing buildings should also comply with this policy when energy reduction and generation measures are undertaken.

## Landscaping

- 21.9 Natural and artificial landscaping can enhance the setting of new buildings and enable them to be assimilated into surroundings. Landscaping can also assist in nature conservation and habitat creation particularly in urban areas.
- 21.10 Tree planting and retention should form an integral part of a landscaping scheme submitted with a development proposal either initially or at a detailed planning stage. Such a scheme may include ground and shrub cover together with hard surfaces and paving materials, adequate lighting and grass verges. Continuity of fencing, walling or hedging with existing boundary treatments, which contributes to the street scene, will be sought where appropriate. Schemes will need to include integration of areas of nature conservation value and provision of new areas into proposals.

#### **D4 - Landscape Requirements**

Landscape schemes must should meet all of the following criteria:

1. Existing landscape features should be recorded in accordance with the requirements of 'trees in relation to construction' BS 5837:2005 in a detailed site survey, to be submitted as part of the full or detailed planning application.
2. Existing features of landscape or nature conservation value should be incorporated into the landscaping proposals and where their removal is unavoidable commensurate provision for their replacement should be made elsewhere in on the site. This should be in addition to the requirement for new landscaping proposals. Where appropriate, existing habitat should be improved and where possible new areas of nature conservation value should be created.
3. Measures to ensure public safety should be incorporated.
4. Measures to ensure routine maintenance and long term management should be included.
5. Provision for the planting of trees, hedgerows, including the replacement of those of amenity value which have to be removed for safety or other reasons, shrub planting and other soft landscaping.
6. The layout and design of roads, parking, footpaths and boundary treatments should make a positive contribution to the street scene and the integration of the development with its surroundings and setting.

#### **Trees on Development Sites**

- 21.11 The District Council recognises that trees, both individually and collectively, make an important contribution to the amenity, character and environmental value of the area. Accordingly the retention of individuals and groups of woodlands and trees will be encouraged. Where trees are inappropriate, have low amenity and environmental value or have short life expectancy, replacement with appropriate new planting may be preferable, especially if this would be beneficial to the landscape. In some circumstances other forms of landscaping may be more appropriate.
- 21.12 To ensure that trees on development sites are not threatened by building works, the construction of drainage systems or other services and that they will not be removed in the long term, the Council requires that all development conforms with the recommendations laid out in BS5837:2005 The Council require that no building or works will be permitted within the construction exclusion zone of trees that have been identified for retention.. Only in exceptional circumstances or where there is no other alternative, will construction, hard surfacing, drainage, underground services or sub soil works be permitted within this construction exclusion zone.
- 21.13 Where there is no alternative to undertaking works within the construction exclusion zone it is the applicant's responsibility to provide clear evidence, from suitably qualified professionals, of the reasons and justification for the proposed work. The application should also specify the methods and details of construction necessary to minimise any damage to the tree(s) in question.

- 21.14 Where it is in the interests of amenity for trees and woodlands to be preserved, the District Council has powers to make Tree Preservation Orders. Under such orders permission is required for lopping, topping and felling work to the tree. The Council also has to be notified of proposals to carry out work on trees in Conservation Areas.
- 21.15 The Hedgerows Regulations 1997 require anyone proposing to remove a hedgerow in the countryside to notify the Council so that important hedgerows can be protected. In general, the system applies to hedgerows 20 metres or more in length, or which meet another hedgerow at each end. Garden hedges are not affected.

#### **D5 - Trees and Development Sites**

Permission will not be granted for developments that would result in the loss of trees or hedges/hedgebanks of significant amenity, historic or conservation value. British Standard 5837:2005 will be taken fully into account in addressing development proposals.

No building, hard surfacing, drainage or underground works will be permitted that does not accord with standards in BS 5837:2005 unless, exceptionally, the Council is satisfied that such works can be accommodated without harm to the trees concerned or there are other over-riding reasons for development to proceed.

The District Council will, as a condition of any planning permission granted, require details as to how trees, hedges and hedgebanks will be protected both during and after construction.

#### **Advertisements**

- 21.16 The quality and extent of advertisements significantly affects the character and appearance of many town centres and Conservation Areas in the District. Advertisements can contribute to life, vitality and colour which enhance the environment, or they can equally destroy or diminish the quality of individual buildings and whole streets. The scale and form of advertisements should harmonise and complement their surroundings and not dominate or appear visually incongruous. Excessive numbers of advertisements on a building can detract from the character of the property and the area.
- 21.17 In considering applications for advertisement consent the Council will seek to ensure the protection and enhancement of its designated conservation areas and will protect the character and setting of any listed buildings. In these cases, on amenity grounds internally illuminated fascia wall, projecting or box signs 'A' boards are unlikely to be acceptable and the Council considers traditional painted fascia boards and hanging signs to be generally more appropriate.



#### **D8 - Applications for Display of Advertisements**

Consent will be granted for applications for the display of advertisements taking into consideration their merits in the interests of amenity and/or public safety and where the following criteria are met:

1. The advertisement is appropriately positioned in relation to the design of the building and is of an appropriate scale.
2. The advertisement does not create a hazard to traffic safety, whether vehicular or pedestrian.
3. Advertisements are kept to the minimum, and amalgamated wherever possible, to avoid clutter which would detract from the character of the building and the street scene.
4. Where a sign is lit the type and level of illumination is appropriate given the general level of lighting in the area.
5. The construction materials and the colours of the advertisement are sympathetic to the building and area.

- 21.18 In rural areas businesses may experience difficulties in being able to direct clients to their premises. Proposals for such signs will be considered against plan policy along with comments made by the County Council as Highway Authority. For facilities within a town, village or recognised signposted settlement, an advance sign will only be acceptable within the settlement and then only if the Authority is persuaded that it is necessary on road safety grounds. For businesses outside a recognised settlement advance signs will not be rejected in principle so long as the applicant can make out a justifiable case.

#### **D9 - Advertisements within Areas of Special Control of Advertisements and Advance Advertisement Signs**

Within Areas of Special Control advertising will be restricted solely to advertisements reasonably required for identification, direction or warning relating to the premises or land upon which they are to be sited except where one or more of the following criteria are met:

1. An advance sign is necessary on road safety grounds and will have no adverse highway implications.
2. The application is to replace a long-established sign with one of similar size and appearance.
3. The sign is for facilities available in towns or villages which have been by passed by road improvements.
4. The sign is for a business outside a recognised settlement with no directional place name provided by the Highway Authority.

#### **Fuel Sources**

- 21.19 Most buildings are presently heated using natural gas, oil, or electricity as the fuel source. Natural gas has the lowest carbon intensity of these fuels, and running costs are typically lower. In addition, direct space heating using off peak electricity and night storage heaters can often result in uncomfortable internal conditions. East Devon has a high proportion of properties that are not heated by natural gas, with

29% of homes being heated by Economy 7 or other sources in 2009. Low carbon heat sources such as biomass boilers, solar hot water panels and heat pumps have even greater environmental, social and financial benefits when implemented in locations that do not have a gas connection. Development proposed in such locations should utilise low carbon heat sources.

#### **D10 – Locations without Access to Natural Gas**

Where development is proposed in locations that are not connected to the natural gas network, space heating and domestic hot water should be provided by low carbon heat sources.

### **Important Local Open Spaces**

- 21.20 Open spaces within urban areas are often very important to the character and individual identity of a town because of their amenity value. In some cases such land is of intrinsically high environmental quality because of its form, tree and shrub cover or features such as a stream. In other instances it is important because of the view it gives of the surrounding countryside or a significant building or landmark. The fourteen sites identified on the Proposals Map as Land of Local Amenity Importance in Axminster, Budleigh Salterton, Exmouth and Sidmouth are open spaces of such particular quality and value to the character of the settlement and to the local community that they should be recognised and conserved and enhanced. In some circumstances the amenity value could be complemented by a community use of the land. Community uses will be supported, subject to such uses not undermining the open quality of an area. Such land areas can often be used for informal or formal recreation purposes though it is their general amenity importance and value to the community which is of greatest relevance.

#### **EN3 - Land of Local Amenity Importance**

Development of land shown on the Proposals Map as being Land of Local Amenity Importance will not be permitted unless a clear community need for the proposal has been identified and where the development cannot be accommodated elsewhere and would either complement or not undermine the open character of the area.

### **Local Wildlife Sites and Features**

- 21.21 In addition to the national and internationally recognised wildlife sites (addressed through strategic policy) there are many 'local sites' that are of importance. Three categories sites exist - Local Nature Reserves, County Wildlife Sites and County Geological Sites. Policy provides for the protection of these sites.

#### **EN5 - Protection of Local Nature Reserves, County Wildlife Sites and County Geological Sites**

Development or land-use changes likely to have an adverse effect, either directly or indirectly, on:

1. Local Nature Reserves.
2. County Wildlife Sites.
3. County Geological Sites.

either as identified on the Proposals Map in the Local Plan or otherwise existing in the plan area will only be permitted if the justification for the proposals clearly outweighs any harm to the intrinsic nature conservation and/or scientific value of the site. Where development is permitted on such sites adequate compensatory habitat enhancement or creation schemes will be required and/or measures required to be taken to ensure that the impacts of the development on valued natural features and wildlife have been mitigated to their fullest practical extent.

- 21.22 Not all important features can be identified on the Proposals Map and designated sites form just one part of the great range and variety of habitats and species throughout East Devon. Many non-designated sites and features also add to the biodiversity interest, appeal and quality of the District. Wherever possible the Council will seek to support, encourage and promote opportunities for nature conservation, protection and promotion.

#### **EN6 - Wildlife Habitats and Features**

Wherever possible sites supporting important wildlife habitats or features not otherwise protected by policies will be protected from development proposals which would result in the loss of or damage to their nature conservation value, particularly where these form a link between or buffer to designated wildlife sites. Where potential arises positive opportunities for habitat creation will be encouraged through the development process.

#### **Archaeological Features and sites**

- 21.23 Archaeological remains can contain irreplaceable information about our past and are valuable both for their own sake and for their role in education, leisure and tourism. Many archaeological remains are highly fragile and vulnerable to damage and destruction. East Devon has a significant archaeological heritage which is a finite and non-renewable resource.
- 21.24 There are nearly 200 nationally important Scheduled Ancient Monuments within the Local Plan area and these are identified on the Proposals Maps. Other sites of local interest are recorded in the Devon Sites and Monuments Register which is maintained by the County Council. Due to the large number of sites, their size and form and the large number of new sites added each year, it would be impracticable to show them on the Proposals Map.

#### **EN7 - Nationally and Locally Important Archaeological Sites**

Development that would harm nationally important archaeological remains or their settings, whether scheduled or not, will not be permitted. Development that would harm locally important archaeological remains or their settings will only be permitted where the need for the development outweighs the damage to the archaeological interest of the site and its setting. There is a presumption in favour of preservation in situ in the case of nationally and locally important remains. Preservation of locally important remains by record will be required where the need for the development outweighs the need to preserve the remains in situ.

- 21.25 Prospective developers should in all cases give consideration to the question of whether archaeological remains exist on a site where development is planned and the implications for the development proposal. Where a proposal involves a site of archaeological significance or of potential interest, it may be necessary for the developer to carry out an evaluation prior to the determination of a planning application. The County Archaeologist Service will be able to provide advice to the developers about areas where prior evaluation will be appropriate.

#### **EN8 - Proposals Affecting Sites which may Potentially be of Archaeological Importance**

When considering development proposals affecting sites which are considered to potentially have remains of archaeological importance the District Council will not grant planning permission until the archaeological importance has been determined through assessment and/or evaluation.

#### **Listed Buildings, Building Conservation and Listed Buildings**

- 21.26 Listed Buildings and their settings are an important element of East Devon's character which the Council wishes to preserve.
- 21.27 Alterations to Listed Buildings must be carried out with the greatest skill and care in order to ensure that changes are not detrimental to the special architectural and historic interest of the building. Unacceptable or undesirable impacts to listed buildings can arise from the use of inappropriate modern materials such as UPVC, aluminium and stained hardwood unless there is an over-riding justification. The Council may request an analysis of the building to aid an assessment of the impact of the proposed changes.

#### **EN9 - Extension, Alteration or Change of Use of Buildings of Special Architectural and Historic Interest**

Development involving the change of use, alteration, extension or demolition of a listed building or development affecting the setting of a listed building, will only be permitted if it preserves the special architectural or historic interest of the building or its setting.

- 21.28 Demolition of a Listed Building will only be permitted in exceptional circumstances. In such cases the Council will seek to ensure that the building is retained until redevelopment is to commence and that the possibilities of relocating the building or

salvaging features of interest are fully explored. An opportunity for recording the building must be given, and an archaeological investigation of the site may be required.

#### **EN10 - Demolition of a Listed Building**

The Council will not grant permission for developments involving the substantial or total demolition of Listed Buildings including any features of special architectural or historic interest which contribute to the reasons for its listing unless:

- There is clear and convincing evidence that all reasonable efforts have been made to sustain existing uses or find viable new uses, and these efforts have failed.
- It is shown that preservation in some form of charitable or community ownership is not possible or suitable.
- The character or appearance of the building will be improved by partial demolition or demolition of features within its setting.
- It is shown that redevelopment would produce substantial benefits for the community which would decisively outweigh the loss resulting from demolition.
- The retention of the listed building as a managed ruin is not a feasible option.

Where demolition of a Listed Building is to be permitted the Council may require that:

- A scheme for the phased demolition and redevelopment of the site providing for its management and treatment in the interim is submitted to and approved by the Council. A copy of a signed contract for the construction work must be deposited with the local planning authority before demolition commences.
- Where practicable the building is dismantled and rebuilt or removed to a site previously approved.
- Important features of the building are salvaged and re-used.
- There is an opportunity for the appearance, plan and particular features of the building to be measured and recorded.
- Provision is made for archaeological investigation by qualified persons and excavation of the site where appropriate.

#### **Conservations Areas**

21.29 Under the Planning (Listed Buildings and Conservation Areas) Act 1990 the Council has a duty to determine which parts of the District are of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance and to designate them as Conservation Areas. Special attention has then to be paid to such areas in all planning decisions. For this reason, proposals for development, or other works within or likely to affect Conservation Areas, should be accompanied by detailed drawings indicating the type of development proposed and its form and materials. The position, scale and detailed design of any new buildings or extensions to existing buildings must have regard to adjoining buildings and to the local character. Conservation Area Appraisals have been published for all the Conservation Areas and these are being updated.

21.30 Within the Conservation Areas the Council will take positive steps to enhance the area by implementing schemes for landscaping and visual improvement and by

seeking to remove features including advertisements and satellite dishes, which detract from the character and appearance of the area. The Highway Authority will also be requested to pay particular attention to paving, kerbing and all types of street furniture, such as lighting standards and direction signs, in order to protect the character of the area.

#### **EN11 - Preservation and Enhancement of Conservation Areas**

Proposals for development, including alterations, extensions and changes of use, or the display of advertisements within a Conservation Area as shown on the proposals maps, or outside the area, but which would affect its setting or views in or out of the area, will only be permitted where it would preserve or enhance the appearance and character of the area.

- 21.31 In Conservation Areas the emphasis should generally be on renovation and re-use rather than demolition and redevelopment. The existing buildings within Conservation Areas usually reflect the historical and architectural importance of the area and their loss should be avoided wherever possible.

#### **EN12 - Demolition of Unlisted Buildings in Conservation Areas**

Development involving demolition, or partial demolition, of an unlisted building in a Conservation Area will only be permitted if:

1. The structure to be demolished makes no material positive contribution to the character or appearance of the area.
2. Detailed proposals for the re-use of the site, including any replacement building or other structure have been approved.
3. There is clear and convincing evidence that all reasonable efforts have been made to sustain existing uses or find viable new ones and these efforts have failed.
4. It is shown that re-development would produce substantial benefits for the community which would outweigh the loss resulting from demolition.

#### **Parks and Gardens of Historic Importance**

- 21.32 English Heritage (The Historic Buildings and Monuments Commission) maintains a Register of Parks and Gardens of Special Historic Interest. Eight of these are situated in East Devon and are graded similarly to listed buildings. If other sites are considered suitable, the District Council will seek their inclusion in the Register.
- 21.33 The Register aims to draw attention to important historic gardens and parks as an essential part of the Nation's Heritage which merit protection and conservation. Other parks and gardens and designed landscapes and public open space, in particular urban parks in the District are of regional or local importance and merit protection. The impact of development upon a registered park or garden is a material consideration of a planning application. Any application which would affect the character of any historic park or garden on the Register must be referred to the Garden History Society for comment. Applications affecting Grade I or Grade II\* registered parks or gardens must also be referred by the Council to English Heritage.



### **EN13 - Development Affecting Parks and Gardens of Special Historic Interest**

Planning permission will not be granted for developments which would damage the character, appearance or setting of the following Parks and Gardens of Special Historic Interest (as shown on the proposals maps)

1. A La Ronde and the Point-In-View at Exmouth. Grade II
2. Bicton Gardens, Bicton. Grade I
3. Cadhay, Ottery St Mary. Grade II
4. Combe House, Gittisham. Grade II
5. Killerton, Broadclyst. Grade II\*
6. Rockbeare House, Rockbeare. Grade II
7. Connaught Gardens, Sidmouth. Grade II
8. Rousdon, Combpyn Rousdon. Grade II

### **Important Agricultural Land**

- 21.34 The Local Plan area contains a substantial amount of agricultural land, much of which is of high quality in terms of the (former) Ministry of Agriculture, Fisheries and Food's classification. Some of the areas of highest quality land are in close proximity to settlements where pressures for development are amongst the greatest. Local Plan policy specifically seeks to conserve and protect the highest grades of agriculture land.

### **EN14 - Development on High Quality Agricultural Land**

The best and most versatile agricultural land (Grades 1, 2 and 3a) will be protected from development not associated with agriculture or forestry. Planning permission for development affecting such land will only be granted exceptionally if there is an overriding need for the development and either:

1. (a) Sufficient land of a lower grade (Grades 3b, 4 and 5) is unavailable. Or:  
(b) Available lower grade land has an environmental value recognised by a statutory wildlife, historic, landscape or archaeological designation and outweighs the agricultural considerations.
2. The benefits of the development justify the loss of high quality agricultural land.

If best and most versatile land needs to be developed and there is a choice between sites in different grades, land of the lowest grade available must be used except where other sustainability considerations, including intrinsic nature conservation value of a site, suggest otherwise.

### **Environmental Pollution**

- 21.35 Pollution in the environment has significant implications for people's health and quality of life. The possible pollution effects from proposed development can be a material consideration in determining planning applications insofar as they affect development and the use of land. Where the Council considers a proposal may raise

such issues the relevant statutory pollution control authorities will be consulted at an early stage. Within the powers available to it, the Council will control and reduce pollution in the environment. Where external lighting is required, as part of a development proposal, full details of the proposed lighting scheme will be required to demonstrate that this is the minimum needed for security and working purposes and minimises light pollution from glare and spillage (particularly in areas of open countryside and areas of nature conservation value) and that it will not detract from residential amenity or highway safety.

- 21.36 Applications involving the production or management of animal waste should demonstrate how waste and other nuisance, such as smell and flies, will be controlled.
- 21.37 Radon is a naturally occurring radioactive gas present in variable amounts in rocks and soils. The likelihood of amounts in East Devon exceeding the draft UK acceptable standard is thought to be remote. There is a possible risk of raised radon levels in older properties, though with modern building techniques protection and mediation measures can address potential problems. Appropriate account should be taken of potential radon emission problems/issues in any development proposal.

#### **EN15 - Control of Pollution**

Permission will not be granted for development which would result in unacceptable levels of:

1. Pollution of the atmosphere by gas or particulates, including. smell, fumes, dust, grit, smoke and soot.
2. Pollution of surface or underground waters including:
  - i) Rivers, other watercourses, water bodies and wetlands.
  - ii) Water gathering grounds including water catchment areas, aquifers and groundwater protection areas.
  - iii) Harbours, estuaries or the sea.
3. Noise and/or vibration.
4. Light intrusion, where light overspill from street lights or floodlights on to areas not intended to be lit, particularly in areas of open countryside and areas of nature conservation value.
5. Fly nuisance.

- 21.38 Previously developed land (Brownfield Sites) and occasionally Greenfield Sites may have been contaminated on account of past land uses, such as fuel filling stations, gas works and industrial processes. Such contamination may pose risks to current or future site occupiers, buildings on the site and to the environment. The risks must be identified early in the development process to ensure that appropriate mitigation measures are taken. This should take the form of a source – pathway – receptor assessment. The sources of the hazard (e.g. heavy metal contamination), the receptors (e.g. public water supply borehole) and the pathway connecting the two (e.g. contaminated groundwater plumes) are considered. Risks posed can then be assessed and suitable mitigation put in place to reduce the risks to an acceptable level. The investigation and remediation proposals should be undertaken by the

developer either before planning permission has been granted or by means of planning condition.

#### **EN16 - Contaminated Land**

Where it is anticipated that contamination may be present near or on a proposed development site an assessment will be required to characterise the contamination and establish the likely risks posed. This assessment will be required either prior to the granting of planning permission or by condition, depending on the severity of the contamination and magnitude of risks posed, on a site specific basis. Development will be permitted where sufficient information is provided to characterise the risks posed and practicable and effective measures are taken prior to development to remediate the site so as to reduce such risks to an acceptable level.

Development that falls in close proximity to existing or former waste disposal sites will only be permitted where it can be shown that public health and safety will not be adversely affected by pollutants emanating from the waste site.

#### **Water Quality, Sewerage, Flooding and Coastal Erosion**

- 21.39 The Council recognises the importance of water quality to a wide range of uses, including abstraction for potable supply, industrial water supply, fisheries, livestock watering, spray irrigation, amenity, wildlife and conservation. Consideration must be given to any possible impact of development on groundwater recharge, flows and levels. Where it is anticipated that works might penetrate the natural winter water table the Environment Agency would expect a full hydro-geological assessment and impact statement to be undertaken. Further, where detrimental consequences for water resources were shown to be likely there will need to be suitable mitigation measures.
- 21.40 New development can significant impact on water quality as a result of surface and wastewater discharges, store of potentially contaminated materials or other contaminated land uses. Initial construction activity can also influence damage riverbanks, aggravate erosion and disturb contaminated land. In determining planning applications for new development the Council, in conjunction with the Environment Agency, will give close consideration to the possible implications for both surface and ground water. Development which threatens existing water quality or quantity will not be permitted. Due regard will therefore be given to the Environment Agency's Policy and Practice for the Protection of Groundwater (PPPG) which may impose constraints on development. The Environment Agency has derived Source Protection Zones for potable public water supply, and other human consumption uses. These zones represent the groundwater catchments of the sources and are derived by current techniques and methods and are dependent on the current abstraction and various physical parameters. As such they are not fixed and require both ongoing management and periodic review. Furthermore, Source Protection Zones have only been published for the above types of supply but exist for all other potable supplies. The published Source Protection zones are available on the Environment Agency's website ([www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)). There are a

number of sources within the Otter Valley for which Source Protection Zones have been published.

#### **EN17 - Maintenance of Water Quality and Quantity**

The Council will require developers to take appropriate measures to ensure that development does not adversely affect the quality or quantity of either surface or groundwater. Development that would result in adverse impacts or potential for pollution will be restricted within Source Protection Zones.

- 21.41 Most of the settlements within East Devon are connected to main sewers. However, many existing sewerage systems and sewage treatment works are at or near capacity. Unless additional infrastructure is provided further demands placed on existing facilities may result in the pollution of controlled waters. Consequently development should only take place where existing infrastructure is adequate, or where new facilities will be provided to coincide with the new demand. Prospective developers should contact the Environment Agency regarding drainage restrictions.
- 21.42 The drainage restrictions currently operating in East Devon may change within the plan period and developers are therefore strongly advised to contact South West Water in order to obtain the latest information on drainage restrictions operating in the area they wish to develop.

#### **EN18 - Adequacy of Foul Sewers and Adequacy of Sewage Treatment System**

New development will not be permitted unless a suitable foul sewage treatment system of adequate capacity and design is available or will be provided in time to serve the development.

- 21.43 In rural areas where connection to the main sewer is not possible new development may be served by private sewage plants. Private systems may also be used for new development in areas affected by drainage restrictions preventing connection to the main sewer. However, the installation of a private sewage treatment system will only be possible on plots of adequate size and if detailed assessment of the site and local environment shows adverse effects will not arise. As a general principle new development should be served by new or existing public foul sewerage systems and sewage treatment plants, rather than a proliferation of small private sewage treatment systems.
- 21.44 DETR circular 03/99, on 'Planning Requirement in respect of the Use of Non-mains Sewerage incorporating Septic Tanks in New Development' identifies factors that detailed assessment should consider. This includes assessment of soil drainage characteristics, potential adverse effects on groundwater and the wider water environment. To meet these requirements, percolation test results to help characterise ground conditions and a water interest survey identifying local water supplies should be provided. Information on existing septic tanks in the vicinity is also relevant as new disposals may be unacceptable where proliferation of septic tank soakaways has occurred, overloading the treatment capacity of the ground.

#### **EN19 - Private Sewage Treatment Works**

Development where private sewage treatment systems are proposed will not be permitted unless ground conditions are satisfactory and the plot is of sufficient size to provide an adequate subsoil drainage system.

21.45 Both the impact of flooding on future development and the impact that development could have on patterns of flooding elsewhere are important planning considerations. Climate change may lead to increased risks of flooding over the lifetime of new developments. A Strategic Flood Risk Assessment for East Devon was completed in 2008. It was prepared to support the application of the sequential test outlined in Planning Policy Statement 25 and confirmed in the Draft National Planning Policy Framework. The policy approach set out follows the advice in both documents to apply a sequential approach and, if necessary, an exceptions test.

#### **EN20 - River and Coastal Flooding**

A sequential approach will be taken to considering whether new developments excluding minor developments and changes of use (minor development includes non residential extensions with a footprint of less than 250 square metres, development that does not increase the size of the building or householder development unless it would create a separate dwelling) will be permitted in areas subject to river and coastal flooding.

Wherever possible developments should be sited in Flood Zone 1 as defined in the East Devon District Council Strategic Flood Risk Assessment<sup>69</sup>. Only if there is no reasonably available site in Flood Zone 1 will locating the development in Flood Zone 2 and then Flood Zone 3 be considered. The flood vulnerability of proposed development, as set out in Appendix D of the East Devon Strategic Flood Risk Assessment will be taken into account.

If, after following this sequential approach, acceptable sites cannot be found and the development is necessary for wider sustainable development reasons, development may be permitted if all of the following criteria are met.

1. It is demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk.
2. The proposed development is on previously developed land that is suitably located and available for development, unless no reasonable alternative sites are available.
3. A flood risk assessment demonstrates that the development will be safe, without increasing flood risk elsewhere and, where possible, will reduce flood risk overall.

This shall not apply to 'highly vulnerable' development in Flood Zone 3a or 'less vulnerable'; 'more vulnerable'; or 'highly vulnerable' development in Flood Zone 3b as defined in the East Devon Strategic Flood Risk Assessment.

<sup>69</sup> East Devon District Council Strategic Flood Risk Assessment Level 1 SFRA, Halcrow Group Limited, (2008)

- 21.46 Increased surface water run off can contribute to accelerated cliff erosion. To safeguard our coastal communities it is important that development that could exacerbate this problem is controlled.
- 21.47 New developments may result in a substantial increase in surface water run-off as permeable surfaces are replaced by impermeable surfaces such as roofs and paving. This may result in an increased risk of flooding downstream, increased pollution, silt deposition, damage to watercourse habitats and river channel instability. Consequently, surface water run-off implications of new development will be closely examined during the planning application process. Planning permission will only be granted where the Council is satisfied that suitable measures, designed to mitigate the adverse impact of surface water run-off, are included as an integral part of the development.
- 21.48 Traditional surface water drainage techniques associated with development, such as piping run-off directly to watercourses can result in:
- Increased likelihood of flooding.
  - Deterioration in the quality of surface and groundwater.
  - Erosion of riverbanks.
  - Damage to habitats, ecosystems and the life they support.
  - Depletion of groundwater.
- 21.49 Sustainable urban drainage is the practice of controlling surface water run-off as close to its origin as possible before it enters a watercourse. Such systems should be the first consideration when designing for surface water run-off. This will involve moving away from traditional piped drainage systems to softer engineering solutions to enable the following:
- Reducing the flood risk from development within a river catchment.
  - Minimising diffuse pollution arising from surface water run off.
  - Reducing the risk of pollution to aquifers.
  - Minimising environmental danger.
  - Maintaining or restoring the natural flow regime of the receiving watercourse.
  - Maintaining recharge to groundwater.
- 21.50 Systems may include:
- Grass swales, soakaways and filter strips.
  - Infiltration basins, trenches or other infiltration devices.
  - Detention and retention ponds.
  - Wetlands with optional reed beds.
  - Permeable surfaces and porous pavements.
- 21.51 Remedial work may be required some distance from the application site. In such cases the developer will be expected to enter into a planning obligation to ensure that the required work is carried out. Developers will be expected to cover the costs of assessing surface water drainage impacts and of any appropriate mitigation works, including long term management.



**Policy EN21A (Surface Run-Off Implications of New Development)**  
**Planning permission for new development will require that: -**

1. The surface run-off implications of the proposal have been fully considered and found to be acceptable.
2. Appropriate remedial measures are included as an integral part of the development, (where practicable sustainable urban drainage systems in accordance with Environment Agency recommendations are encouraged)
3. Where remedial measures are required away from the application site, the developer is in a position to secure the implementation of such measures.
4. A Drainage Impact Assessment will be required for all new development with potentially significant surface run off implications.

**EN21B - Coastal erosion and surface water run off**

**Development proposals that are likely to increase coastal erosion as a result of changes in surface water run-off will not be permitted.**

21.52 The Shoreline Management Plan 2 (SMP2) <sup>70</sup> forecasts shoreline positions in three year periods (0-20 years, 20-50 years and 50-100 years). This breakdown provides valuable information on when a particular property is likely to be affected and is the best information available unless a site specific study is undertaken with new data to update the SMP2 findings. Land and properties within, or affected by the 100 year coastal erosion risk area shown in the SMP2 will be included in the Coastal Change Management Areas to be defined on the proposals map. Areas within the 0-20 year epoch will only be suitable for uses directly linked to the coast such as beach huts, cafes, car parks, and sites for short let caravan and camping use, subject to time limiting planning permissions. Areas within the 20-50 risk epochs may be suitable for extensions, including householder development and in the 50-100 year epoch uses requiring a coastal location and providing social and community benefits may be acceptable. This may include upgrading existing development such as holiday facilities and some commercial development, but new homes will not be permitted.

**New Proposed Policy EN22 - Development in Coastal Change Management Areas**

Within the Coastal Change Management Areas to be identified on the Proposals Map new dwellings or conversion of existing buildings to residential use will not be permitted. All other development, including redevelopment, extensions and change of use of land will only be permitted if it has been satisfactorily demonstrated that no increased risk to life or significant risk to property would result.

21.53 Proposals for privately funded or public works to defend coastal land or property must be assessed in a holistic manner in order to identify and consider potential impacts that disruption to natural processes may cause and to ensure defence measures are technically sound and sustainable in the long term.

<sup>70</sup> [South Devon and Dorset Coastal Authorities Group \(SDADCAG\)](#)

### **New Proposed Policy EN23 - Coastal Defence Schemes**

The Council will support proposals for sustainable coastal change management, such as improvements to coastal defences or managed realignment, where they are in line with the Shoreline Management Plan 2 and provided they would not have any unacceptable adverse economic, social or environmental impacts, including a detrimental visual impact on a protected landscape.

21.54 This 'roll back' policy is included as a precaution against coastal erosion affecting commercial and community uses/buildings, although the SMP2 does not highlight significant risk to large numbers of assets. The detailed criteria are intended to balance the relocation taking place in advance of property loss with the need to protect the environment. This policy is in line with the approach advocated in both the PPS25 Coastal Change Supplement and the draft National Planning Policy Framework, which advises local planning authorities to make provision for development and infrastructure that needs to be located away from Coastal Change Management Areas.

### **New Proposed Policy EN24 - Relocation and Replacement of Development Affected by Coastal Erosion Risk**

Proposals for the relocation and replacement of community facilities, commercial and business uses that are considered important to coastal communities and are forecast to be affected by coastal erosion within 20 years of the date of the proposal affected by coastal erosion may be considered favourably subject to the following criteria:

1. The use or property is required as a replacement for a use or site which is.
2. The new development is located either outside of the Coastal Change Management Area, or within a part of the Coastal Change Management Area at less risk.
3. The replacement property is located close to the community from which it is displaced and has an acceptable relationship with it in terms of character, setting, local amenity and any special landscape designations.
4. Overall, taking both the existing and proposed buildings, the proposal should not have an additional detrimental impact on the landscape, townscape or biodiversity of the area, taking account of any special designations.
5. The existing site is either cleared and restored with enhancements for nature conservation or put to a temporary use to benefit the local community within three months of the first use of the replacement. The future use of the site should be secured in perpetuity and provision made for public access to the coast where appropriate.
6. The development is consistent with Countryside policy of the Local Plan..

21.55 Policy of the Local Plan provides for non-strategic site development at the locations listed in plan policy. These smaller scale allocated sites will primarily ensure availability of land for development purposes across East Devon. Sites in villages and rural areas (sites outside of the seven main towns of the District) for ten dwellings or more will also be required to incorporate employment provision (see employment policies of the plan).

## **New Homes and Residential Development**

21.56 Thorough policy work we will identify sites for new homes to be built.

### **H2 - Residential Land Allocation**

Proposed local, small scale or non strategic allocations sites are not defined at this stage of plan making/in this consultation draft of the plan. These local, small scale or non-strategic sites will be considered through one or more of the following:

- a) Further consultation and site assessment work on this Local Plan.
- b) A 'follow on' site specific allocation Local Plan document.
- c) Neighbourhood Plans.
- d) Other local planning initiatives.

It is recognised however, that some respondents to this consultation document will want to propose local, small scale or non strategic sites for residential development purposes. If this Local Plan does ultimately include local, small scale or non-strategic housing allocation sites they will feature under an amendment to this policy. However, if this plan does not show local, small scale or non-strategic sites then policy be irrelevant and deleted. Site submissions will inform subsequent work.

In proposing sites for development purposes respondents should comment on the following considerations which will be included in site assessment work:

1. Use, where possible, of sites falling inside existing Built-up Area Boundaries.
2. Demonstration of land owner interest in seeing the site developed.
3. Preference for use of Brownfield/previously developed land.
4. Avoidance of features of environmental importance.
5. Easy site accessibility, by walking and cycling, to facilities and public transport services.
6. Sites being well related to existing Built-up Area Boundaries.

In rural areas (outside of the seven main towns of East Devon) sites should also be suitable for mixed use residential and small scale employment uses.

21.57 Local Plan Policy seeks not only to provide new homes but aims to provide wider housing opportunity and choice and a better mix in the size type and location of housing than is currently available. Accordingly, it is appropriate for developers to provide a range and mix of housing type, size and affordability within new residential developments and conversions. Due to size constraint limitations it is not considered that all sites will be suitable for the application of this policy, therefore a threshold has been incorporated into the policy, above which developers will be expected to take into account this policy in proposed schemes.

### **H3 - Range and Mix of New Housing Development**

Planning permission will not be granted for new residential development which provides for 15 dwellings or more, or is situated on a site of 0.5 ha or larger, unless it contains a mix of dwelling sizes or comprises predominantly, or totally, of smaller dwellings.

## **Affordable Housing provision**

- 21.58 The District Council has taken and will continue to take initiatives aimed at securing affordable housing by permitting development in locations where ordinarily, residential development would not be acceptable. For such land to be released however, rigorous stipulations will be applied to avoid prejudicing the environmental conservation policies of the plan. Development of such sites will not be regarded as creating a precedent for future expansion to meet other housing needs.
- 21.59 The 'Right to Buy' of Council Housing in rural areas has not generally reduced the number of elderly person bungalows and flats. This accommodation exceeds demand in some parishes. For the non-elderly sector, however, affordable housing is far scarcer.
- 21.60 Plan policy follows national advice whereby small sites within or adjoining villages (typically abutting Built-up Area Boundaries) which would not normally be released for housing can exceptionally be released for affordable housing. This is provided that need can be demonstrated, that the local need cannot be accommodated in any other way and that long-term arrangements can be made to reserve the housing for local people.
- 21.61 In considering the need for affordable housing the District Council will have regard to the housing needs assessment and also additional Council records. Account will be taken of the specific need within the Parish in which the application land is sited and in addition regard will also be paid to need in surrounding Parishes. The grouping of geographic parishes will be used for assessing housing needs is as follows:

### Single Parishes

- Colyton.
- Exmouth.
- Honiton.
- Newton Poppleford & Harford.
- Seaton.
- Sidmouth.

### Parishes that are grouped

- Axminster and Hawkchurch.
- Beer and Branscombe.
- Broadclyst, Clyst Honiton, Clyst Hydon, Clyst St. Lawrence, Rockbeare and Poltimore.
- Budleigh Salterton and East Budleigh.
- Clyst St. George, Clyst St. Mary, Farringdon and Sowton.
- Coly Valley, Farway, Northleigh and Southleigh.
- Offwell & Widworthy.
- Dunkeswell, Combe Raleigh, and Sheldon.
- Brampford Speke, Huxham, Netherexe, Rewe, Stoke Canon and Upton Pyne.

- Feniton, Buckerell and Gittisham.
- Dalwood, Kilmington, Musbury and Shute.
- Cotleigh, Luppitt, Monkton, Stockland and Upottery.
- Ottery St Mary and Aylesbeare.
- Bicton, Colaton Raleigh, and Otterton.
- Awliscombe, Broadhembury, Payhembury and Plymtree.
- Axmouth, Combpyne Rousden and Uplyme.
- Whimble and Talaton.
- Woodbury and Lympstone.
- All Saints, Chardstock, Membury and Yarcombe.

#### **H5 - Affordable Housing on Exception Sites**

The provision of affordable housing should, wherever possible, be accommodated on sites within Built-up Area Boundaries. Where this is not possible, planning permission may be granted for small-scale developments for affordable housing on sites which would not otherwise be released for residential development provided that clear evidence of the community's need for affordable housing exists and that:

1. The need in any given locality would not otherwise be met.
2. The development is within or well related to a village with a population below 3,000 persons, is well designed using local materials, well related to the existing built form, community services and facilities and sympathetic to the character of the settlement and has a satisfactory highway access.

initial and subsequent occupancy of the affordable housing is restricted to a person(s) who:

- i) Does not have access to general market housing.
- ii) Is a resident of that Parish group, or has a local connection with that parish group because of family ties or a need to be near their workplace.

In the event that an occupier who fulfils both (or either) of criterion (i) or (ii) cannot be found within a reasonable period of time, then criterion (ii) will be widened firstly to a person(s) with a local connection to a neighbouring parish group because of family ties or a need to be near their workplace, and subsequently to a person(s) with an East Devon connection.

General market housing, or mixed housing used to cross-subsidise affordable housing on the same site, are not appropriate within the context of this policy.

#### **Conversion of Houses to Flats**

21.62 The flats resulting from house conversions can be a valuable addition to the housing stock. Such dwellings should not be substandard in terms of private amenity space and unless well served by public transport or with ready accessibility to services, such as in a town centre location, they should have appropriate provision for car parking. In addition matters such as room sizes, daylight and ventilation, means of escape and noise insulation will be relevant concerns and as such developers will need to be aware of legislation, other than that relating to planning controls, that will need to be complied with. Flat conversion can often have undesirable environmental effects such as hard

surfacing of garden areas, external staircases and unattractive refuse storage areas that can damage the character and amenity of an area. In some town locations car parking is a serious problem and in these areas proposals which would result in an unacceptable increase in on-street parking will be resisted.

#### **H6 - Conversion of Existing Dwellings and Other Buildings to Flats**

Within Built-up Area Boundaries planning permission will be granted for the conversion of existing residential properties to self contained flats provided:

1. The proposed conversion will not materially adversely affect the character and amenities of the surrounding area or the building itself.
2. It is well served by public transport and provision is made for adequate car parking. Hard surfacing of front gardens to facilitate car parking will not be permitted where this would have an unacceptably harmful effect on the appearance of the area or on flooding.
3. Provision is made for storage of refuse.

Proposals for the conversion of buildings not in residential use will need to be compatible with other relevant policies in the Local Plan and the above criteria. Beyond Built-up Area Boundaries the conversion of existing residential properties will only be permitted where they meet all of the above criteria and they are compatible with environment policies of the plan regulating building conversions in the open countryside.

#### **Agricultural Workers Homes**

- 21.63 Despite falling employment on farms there remains a demand for new dwellings for people employed in agriculture and exceptionally forestry or other countryside related activities. By necessity these may need to be located on sites outside Built-up Area Boundaries. The Council are concerned that this should be restricted to cases of essential need (as opposed to personal preferences) in the interests of limiting sporadic development in the countryside. Applicants seeking planning permission will be required to submit evidence justifying the agricultural or forestry need. The Council will normally carry out functional and financial tests to assess the issue of need. The Council will require demonstration that the enterprise requires a full-time worker. This time may be made up by the labour of one or more members of the household who work the land.
- 21.64 When assessing the justification for agricultural dwellings the Council will have regard to both past business trends and future business projections. Past years' financial figures really only relate to the historical situation but with agriculture declining and changing direction, give no indication of the future for the holding. Future projections can best be explored by a business plan approach. The business plan would need to look at future projections both in practical and financial terms and would indicate whether a holding is viable and expanding and if it can justify and support an additional dwelling.
- 21.65 In terms of judging whether or not there is a functional need, if there is a full time agricultural worker involved, it is necessary to consider agricultural related activity,



most particularly agricultural contracting. The ownership of large and expensive machinery is often beyond the resources of the individual farmer and agricultural contracting businesses have grown up to overcome this difficulty and the relevant equipment is hired in at the appropriate moment in the farming season. However, such businesses renting out agricultural equipment do not necessarily need to be located in the open countryside and as such they may not meet the test required for agricultural occupancy dwellings.

- 21.66 Some newer and emerging agriculture related activities may also provide justification for agricultural dwellings.
- 21.67 In addition, there are a multitude of agriculturally related jobs, some of which are more tenuous in their relationship than others. There are also those who work in businesses that add value to agricultural produce or in businesses that are the subject of diversification on particular farms. The issue of whether time is spent in agricultural related activity and hence agricultural dwelling tests are met, will relate very much to the types of activities undertaken.
- 21.68 Where the need for a new dwelling is established it will still be necessary to ensure that a new building is constructed only where there are no other more suitable alternatives, such as the conversion of existing buildings on a holding. It will also be necessary to restrict, in perpetuity, the occupancy of such new dwellings to agricultural or forestry workers and their resident dependants by means of planning conditions or Section 106 agreements. Furthermore, many dwellings on agricultural holdings are older established properties which pre-date modern planning legislation and are unlikely to have restrictions on their occupancy. A new house will not be permitted when it would make another such existing house no longer necessary in relation to the operation of the holding. Where a dwelling is permitted on a holding it must not exceed a size necessary to meet the reasonable needs of the worker/s. Each dwelling, under the control of the applicant, which houses the holdings worker/s, will be made subject to an occupancy condition. These measures will help to protect the countryside against undue pressure for new houses.
- 21.69 Horticulture is included within the definition of agriculture contained within the Town and Country Planning Act (1990). In recent years there have been a number of applications for mobile homes or dwellings in association with horticultural enterprises. Polytunnels are replacing glass houses to produce a variety of crops intensively. In considering applications for mobile homes or dwellings on such sites, the Council will need to be satisfied as to the viability and permanency of the holding and the need to live on site.

### **H8 - Dwellings for Persons Employed in Agriculture or Forestry**

Permission for dwellings in the countryside for new agricultural or forestry workers will be granted where the proposal fully satisfies the following:

1. There is a proven and essential agricultural or forestry need for the occupier of the proposed dwelling to be housed permanently on the unit for functional reasons and the size of the proposed dwelling is commensurate with the scale of the established functional need. Where this need is unproven a temporary dwelling (such as a mobile home) may be permitted to allow time to establish that there is a genuine functional and financial need for a permanent dwelling. A temporary dwelling will normally be permitted for a period of three years.
2. In the case of a permanent dwelling, the agricultural or forestry unit has been operational for a minimum of three years, it is demonstrable that it is commercially viable and has clear prospects for remaining so.
3. A financial assessment, specifically in the form of a business plan setting out projected future operations, must demonstrate future operational viability.
4. The qualifying test of agricultural occupancy must involve at least one occupant being employed full time on the agriculture or forestry unit. Two occupants in partnership can meet the condition so long as their joint weekly hours equate to a full working week in agriculture.
5. There are no buildings on the holding suitable for conversion to meet the residential need. Sale within the last three years of any dwellings or buildings suitable for conversion will be taken into account and will count against 'need' in the assessment carried out.
6. Any permission granted will be subject to an agricultural occupancy condition on the proposed dwelling and where appropriate, any existing dwelling on the farm holding. Applications for extensions to, or replacement of, agricultural or forestry workers dwellings (other than where minor works are proposed) will require a reassessment of need.

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

- 21.70 It is important that there are conditions to ensure that agriculture dwellings are occupied by people that genuinely need to be housed at or on the holding. This policy seeks to ensure that this is the case.

### **H9 - Occupancy Conditions on Agricultural/Forestry Dwellings**

Proposals to relax occupancy conditions or a planning obligation will only be permitted where it is demonstrable that economic circumstances have changed such that:-

1. There is no long term functional need for the dwelling for an agricultural or forestry worker. And:
2. Satisfactory evidence has been provided that the dwelling has been offered for sale or rent with its occupancy restriction, at a realistic price for a reasonable period of time (at least 12 months and up to 2 years depending on market conditions), and no interest has been shown in its purchase or rent, unless the property is to be sold/ leased to a Registered Social Landlord. Records of all viewings and offers will be required and the property should be regularly advertised in specialist agricultural publications as well as local media and the internet.

Where these conditions have been met, and there is a demonstrated housing need in the area (as established through a local needs survey as applied to the Parish in which the dwelling is located) the condition will be modified to limit the occupancy of the dwelling to meet local affordable housing needs of the local community.

Occupancy will be restricted to a person or persons who:

- i) Do not have access to general market housing; and
- ii) Is a resident of that Parish group, or has a local connection with that parish group because of family ties or a need to be near their workplace.

Where viable future occupancy will be tied through legal agreement to an agricultural holding.

### **Replacement Dwellings in the Countryside**

- 21.71 The cumulative impact of development that replaces dwellings can lead in the long term to the urbanisation and erosion of the character of countryside areas. Also, as such development tends to increase the size of dwellings, it could reduce the number of smaller dwellings at the cheaper end of the market, this creates an imbalance in the housing stock prejudicial to meeting local needs. There might be exceptional circumstances where it would be desirable to allow the replacement dwelling to be located elsewhere within the site of the existing dwelling or on the same land holding. To be acceptable there would have to be a clear planning or environmental benefit to be gained to allow for relocation.

### **H11 - Replacement of Existing Dwellings in the Countryside**

Proposals for the replacement of an existing dwellings outside the defined Built-up Area Boundaries will be permitted, provided that all the following criteria are satisfied:

1. There is an existing, permanent, habitable dwelling located on the site, which is not a dwelling specifically granted planning permission under the agricultural or forestry exceptions policy.
2. the replacement dwelling is located on, or adjacent to, the footprint of the existing dwelling.
4. the replacement dwelling does not detract from the appearance and character of the landscape, and within the East Devon and Blackdown Hills Areas of Outstanding Natural Beauty harm the natural beauty of the landscape.
5. The dwelling to be replaced is not of architectural importance (whether Listed or not) or important in terms of contributing to landscape character or quality or local distinctiveness.

A condition will be attached to any planning permission granted, which requires the demolition of the existing dwelling prior to the occupancy of the replacement dwelling, should an alternative location for the replacement dwelling be agreed.

### **Gypsies and Travellers**

- 21.72 Gypsies are defined "persons of nomadic habit of life, whatever their race or origin". Although making up a very small proportion of the population of East Devon<sup>71</sup>, their land use requirements for accommodation and work need to be met. Given the variety of occupations in which gypsies are engaged there is no simple profile of an ideal site. Certain factors however, are common in the consideration of any proposals. These are road access, availability of services, potential conflict with established communities or agricultural interests and likely environmental impacts. In considering proposals for gypsy sites, the District Council will need evidence that a genuine need exists and cannot be met elsewhere before taking into account the need to resolve satisfactorily difficulties arising from the above factors.

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<sup>71</sup> Social Research and Regeneration Unit (SRRU) in conjunction with Dr Zoe James from the University of Plymouth "Devon-wide Gypsy & Traveller Housing Needs Assessment" (2006)

### **H12 - Sites for Gypsies and Travellers**

Planning permission for a permanent or transit sites for gypsies and travellers will be granted if the proposal satisfies all of the following requirements:

1. It is not situated within an Area of Outstanding Natural Beauty, Green Wedge or on a site designated as being of conservation interest.
2. It has a satisfactory relationship with other neighbouring land uses.
3. It has acceptable vehicular access and provision for on-site turning, parking and servicing.
4. It contains satisfactory proposals for screening and landscaping.
5. It has no adverse impact on the appearance or character of the landscape or amenity of occupiers of neighbouring properties.
6. The local East Devon need has been proven and cannot be met elsewhere.

Permanent sites should be conveniently located for access to existing community services and facilities.

### **Replacement Dwellings for Homes Lost Through Coastal Erosion**

- 21.73 In the longer term, as a consequence of coastal erosion, some homes can be expected to be lost to the sea. This 'roll back' policy is included as a precaution against unforeseen changes in the coastline as no houses are shown to be directly at risk in East Devon during the first epoch considered in the SMP2 (0-20 years). However, some gardens are shown to be at risk in the first 20 years and it may be that this policy could be used to facilitate relocation of a house, where it was demonstrated that significant loss of garden sufficiently undermined the safety and well being of the occupants. Additionally, the policy is intended to reduce the impact of blight caused by the uncertainty of defining Coastal Change Management Areas and allow home owners time to plan for relocation. The detailed criteria are intended to balance the relocation taking place in advance of property loss with the need to protect the environment. This policy is in line with the approach advocated in both the PPS25 Coastal Change Supplement and the draft National Planning Policy Framework, which advises local planning authorities to make provision for development and infrastructure that needs to be located away from Coastal Change Management Areas.

### **H13 - Relocation and Replacement of Housing Affected by Coastal Erosion**

Applications for the replacement of existing permanent dwellings (with unrestricted occupancy) situated within a Coastal Change Management Area that are likely to be affected by coastal erosion within 20 years of the date of the proposal may be considered favourably subject to the following criteria:

1. The new dwelling is beyond the Coastal Change Management Area shown on the Proposals Map and has an acceptable relationship with the coastal community from which it was displaced in terms of character, setting, local amenity and any special landscape designations.
2. Overall, taking both the existing and proposed buildings, the proposal should not have an additional detrimental impact on the landscape, townscape or biodiversity of the area, taking account of any special designations.
3. The site of the existing home is either cleared and restored with enhancements for nature conservation or put to a temporary use to benefit the local community within three months of the occupation of the replacement. The future use of the site should be secured in perpetuity and provision made for public access to the coast where appropriate.
4. The gross volume of the replacement dwelling is no larger than the one it is to replace, taking account permitted development rights associated with the existing dwelling.
5. The development is consistent with the criteria set out in Policy S5: Countryside Protection.

### **Economic Development Jobs and the Economy**

- 21.74 One key means by which the Local Plan can encourage economic development and job provision and creation is by ensuring that there is sufficient and appropriate land available to accommodate employment-generating developments. Strategic policy of the Local Plan sets out specific levels of employment land provision.
- 21.75 In identifying sites for employment purposes in East Devon full regard will be given to needs, expectations and aspirations for differing settlements. Where appropriate the Use-Classes of development that will be permitted on specific sites will be specified in Policy. Proposals for employment uses on allocated land will need to have regard to site access and the travel demands likely to be generated.



### **E1 - Provision of Employment Land**

Proposed local, small scale, non-strategic employment allocation sites are not defined at this stage of plan making. These local, small scale, non-strategic sites will be considered through one or more of the following:

- a) Further consultation and site assessment work on this Local Plan.
- b) A 'follow on' site specific allocation Local Plan document.
- c) Neighbourhood Plans.
- d) Other local planning initiatives.

It is recognised, however, that some respondents to this consultation document will want to propose local, small scale, non-strategic sites for residential development purposes. If this Local Plan does ultimately include local, small scale, non-strategic employment sites they will feature under an amendment to this policy. However if this plan does not show local, small scale, non-strategic sites then policy be irrelevant and deleted. Site submissions will inform subsequent work.

In proposing sites for development purposes respondents should comment on the following considerations which will be included in site assessment work

1. Use, where possible, of sites falling inside existing Built-up Area Boundaries.
2. Demonstration of land owner interest in seeing the site developed.
3. Preference for use of Brownfield/previously developed land.
4. Avoidance of features of environmental importance.
5. Easy site accessibility, by walking and cycling, to facilities and public transport services.
6. Where outside sites being well related to existing Built-up Area Boundaries.
7. Not harming the character or setting of local settlements or the amenity of nearby residents.

21.76 In recognition of the need for appropriate development in both towns and villages the Local Plan makes provision for development of non-allocated sites for employment purposes. In providing for employment potential full account has been made of the importance of safeguarding the existing character and amenities of East Devon, whilst at the same time sustaining and improving the local economy.

21.77 In residential areas some commercial activities are wholly inappropriate because they give rise to noise and disturbance. However, people working from home using a part of a dwelling often start small businesses or they are in established mixed-use areas, and they do not adversely affect neighbouring properties or the character and amenities of the area. Small scale uses which are incidental to the use of a dwelling house may not require planning permission, unless they expand to a point where they become the dominant use or are intrusive.

## **E2 - Employment Generating Development in Built-Up Areas**

Within Built-up Area Boundaries, on sites not allocated or reserved for other uses, new businesses or expansion of existing businesses will be permitted provided the proposed development, whether through re-use of existing buildings or new build, meets the following criteria in full:

1. Where practical it is accessible by pedestrians, cyclists and public transport.
2. It would not generate traffic of a type or amount inappropriate for the character of access roads or require improvements that would damage the character of those roads.
3. It would not harm the character or setting of local settlements or the amenity of nearby residents.
4. It would not harm any site of nature conservation value or archaeological importance or any building of architectural or historic interest.
5. It would blend into the landscape and/or townscape in terms of design, siting and materials.

Within the built-up Area Boundaries of the 7 coastal and market towns of the district we will support regeneration schemes designed to increase net job opportunities in the business, retail and/or leisure use classes, subject to the criteria listed above.

### **Loss of Employment Sites**

- 21.78 Proposals, particularly for residential development, may be received which would mean the loss of an employment use of a site. Without restrictive policies aimed at preventing the loss of employment sites it is likely that loss to other uses would increasingly undermine the employment base and job opportunities in East Devon.
- 21.79 A small number of employment sites, particularly in residential areas, may be poorly sited and give rise to problems such as traffic congestion and safety problems, noise, fumes and other amenity or environmental problems. In such cases, and where a site is not reasonably suited to accommodating an alternative business use, then redevelopment for a differing use may be permitted.

### **E3 - Safeguarding Employment Land and Premises**

Permission will not be granted for the change of use of current or allocated employment land and premises where it would harm business and employment opportunities in the area, unless:

1. Employment uses would significantly harm the quality of a locality whether through traffic, amenity, environmental or other associated problems; or
2. The new use would safeguard a listed building where current uses are detrimental to it and where it would otherwise not be afforded protection; or
3. Options for retention of the site or premises for employment uses have been fully explored without success and there is a clear demonstration of surplus supply of employment land in a locality; or
4. The proposed use would result in the provision or restoration of retail (Class A1) facilities in a settlement otherwise bereft of shops.

Employment uses will be those falling into Class B of the Use Classes Order or similar uses classified under planning legislation as 'Sui Generis' uses. Redundant petrol filling stations and associated garage facilities will fall within the scope of this policy.

### **Agriculture and the Rural Economy**

21.80 The agricultural industry and the rural economy in general have undergone considerable changes in recent years although it remains very important in East Devon. Agriculture not only provides direct jobs but also underpins many other economic activities in rural areas. Agriculture is seen as remaining the major user of rural land in East Devon and the use that most influences the physical appearance and character of the countryside.

21.81 In seeking to accommodate desirable new development in the countryside, whilst preventing detrimental developments, recognition will need to be given to the nature, scale and types of pressures which may emerge. There are a variety of countryside and agricultural uses which will need to be considered and which, subject to the precise location, may well be acceptable; these may include:

- i) The keeping of animals which are not traditional agricultural livestock, including horses and donkeys.
- ii) Production of crops other than for consumption including timber, Christmas trees, energy crops and crops for the pharmaceutical industry.
- iii) Recreation and tourism uses including pony-trekking, fishing, rare breed farming and holiday accommodation.

21.82 The District Council recognises the importance and changing role of agriculture and the need for new employment in the rural areas. In particular initiatives aimed at 'adding value' to food and goods produced on farms through processing and packaging initiatives are encouraged. It will however, be essential to carefully consider the appropriateness of new uses, their impact upon the surrounding area and implications of public access, and their relationship to continuing agricultural operations.

### **E5 - Rural Diversification**

Proposals to diversify and expand upon the range of traditional agricultural related economic activities undertaken in rural areas will be permitted where a proposal meets the following criteria in full:

1. The proposal is complementary to, or compatible with, the agricultural operations in the rural area or on a farm and is operated as part of an overall holding.
2. The character, scale and location of a proposal are compatible with its landscape setting and any area of nature conservation importance.
3. The proposal would not use the best and most versatile agricultural land.
4. The likely amount of traffic generated by the proposal could be accommodated on the local highway network without harming road safety.
5. Any new building is modest in scale and is sited in or adjacent to an existing group of buildings and is of a compatible design and will blend into the landscape in terms of design, siting and materials.
6. The proposal would not cause noise, air or water pollution or flooding nor harm the amenity of local residents.
7. All new agricultural and agricultural related buildings with a ridge height of 3 metres or more shall make suitable provision for the nesting of barn owls, whether or not they have been observed at the site.

- 21.83 Small scale economic development in rural areas is needed to promote employment diversification and reduce out commuting. This will increase sustainable employment growth and provide premises close to where people live. Any development will, however, need to be in accordance with protection of environmental interests and particularly protection of the open countryside.

### **E6 - Small Scale Economic Development in Rural Areas**

In villages and rural areas small scale economic development (not including retail use classes/other uses in Classes A1 – A4) and expansion of existing businesses designed to provide jobs for local people will be permitted where:

1. It involves the conversion of existing buildings. Or
2. If new buildings are involved, it is on previously developed land. Or
3. If on a Greenfield site, shall be well related to a village development boundary and shall not exceed 0.25ha (gross) in size.

Provided that the following criteria are met: a safe highway access, no detrimental impact upon the amenities of neighbouring properties, wildlife, landscape or historic interests. All new buildings shall be designed to blend into their location and shall meet sustainable construction and on site renewable energy production.

### **Matching New Homes to Job Opportunities in Rural East Devon**

- 21.84 There is a need in East Devon to reduce out-commuting for employment purposes and where developments are given permission it is appropriate to seek contributions to provide employment close to where housing is being developed. In smaller developments provision for home working should be incorporated as this enables

flexibility in work patterns for individuals who are not employed in the immediate area. The link between residential and employment will lead to an increased level of sustainable development.

- 21.85 On rural housing development sites for 10 homes or more (other than where most new homes are to be affordable) the Council will require that new employment provision is included in the development.

#### **E7 - New Employment Provision in Association with residential development**

Where development of 10 residential units, or more are permitted in or adjoining a rural settlement, we will require provision of small employment workspace as part of the overall development. The employment provision should occupy no less than 10% of the net developable site area and typically comprise of small workshop units to be made available for rent or lease on terms to be agreed in writing with the Local Planning Authority and contained within a S106 agreement. On smaller developments provision for home working should be incorporated into individual dwellings.

This policy will not apply where affordable housing will account for over 50% of the proposed development scheme. The policy is applicable for schemes that include open market housing development.

#### **Extension of Established Employment Sites**

- 21.86 It is important for East Devon to develop its employment base and where successful, established sites have reached an 80% built out level an additional extension should be provided to concentrate and encourage successful sites. This policy will offer protection to the surrounding built and natural environment whilst promoting business in the District.

#### **E8 - Extensions to Existing Employment Sites**

Where it is clear that 80% of a business or employment site or estate is occupied the Council will permit a 10% extension (gross area) provided the following criteria are met in full:

1. The local highway network is capable of accommodating the forecast increase in traffic established by a Traffic Impact Assessment; or where these can be mitigated either by physical works being undertaken by the applicant or S106/CIL contributions are secured towards the cost of the works.
2. There will be no detrimental impact upon any nearby residential properties.
3. No protected landscapes or historic interests are adversely affected and the existing local biodiversity and habitats are conserved or enhanced.
4. Requirements are met for onsite renewable energy production.

#### **Succession Housing on Farms**

- 21.87 The Local Plan will promote succession housing on larger working family farms as it recognises the need to retain young talented agricultural workers in the industry. Providing onsite accommodation for family members employed in agriculture at the

property will promote sustainability whilst retaining knowledge and expertise in the industry. Potential dwellings will comply with Lifetime Homes Standards ensuring elderly members of the family can continue to live on the site and share their experience whilst freeing larger dwellings for family use.

#### **E9 - Agricultural Development and Succession Housing**

In order to provide succession planning on working family farms exceeding 100 acres (40.5 hectares) of owned or secured tenancy land, there will be a presumption in favour of a second agricultural dwelling on the holding for occupation by a family member employed in agriculture on the property. Further agricultural dwellings will require financial and functional needs tests to be met. Subject to the following:

1. Any new agricultural dwelling shall be located within or adjoining the farm building complex.
2. Only in the event of there being no existing building suitable for conversion, will a new building be permitted which shall be designed to match the local vernacular design and be built using local materials and meeting policy for sustainable construction and on site renewable energy production.
3. The occupation of the new dwelling and any existing dwelling on the farm (not already tied) shall be the subject of an agricultural tying condition.
4. Evidence is provided to the Local Planning Authority of a farming business being undertaken on the holding [this is a lesser test than the financial and functional tests].
5. The new dwelling meeting lifetime home standards.

#### **Town Centre Vitality**

- 21.88 Town Centres provide a wide range of services and fulfil a variety of functions that need to be accessible to a large number of people from all sectors of the community.
- 21.89 Variety and activity are essential elements of the vitality and viability of town centres. Different, but complementary uses can reinforce each other to attract large numbers of people thereby ensuring the vibrancy of town centres both during the day and in the evening. Non-retail uses such as entertainment facilities, museums, hotels and conference centres, market stalls, restaurants and cafes can add variety. Within town centre shopping areas outside primary shopping frontages A2 (financial and professional services) and A3 (food and drink) uses which contribute to the diversity and vitality of centres will generally be permitted. Other non-retail uses which would detract from diversity and vitality will not usually be permitted.
- 21.90 The District Council promotes the residential use of vacant or under used space above shops and businesses as this encourages owners to keep buildings in a good state of repair, lessens reliance on the car and contributes towards the supply of housing.



### **SH1 - Town Centre Shopping Areas**

Within Town Centre Shopping Areas as defined on the Proposals Map (outside the Defined Primary Shopping Frontages) proposals for both retail and non-retail uses which would add variety and increase activity and uses in Classes A2 and A3 of the Town and Country Planning (Use Classes Order) 1987 will be permitted provided:

1. The use would not undermine the shopping character, and visual amenity, vitality or viability of the town centre.
2. The amenity interest of occupiers of adjoining properties is not adversely affected by reason of noise, smell or litter.
3. It would not cause traffic problems.

Other non-retail uses will not be permitted unless the same criteria are met and the use would not harm the diversity, viability and vitality of the centre.

The establishment of new shops which are outside defined town centres or which would extend the shopping areas will not be permitted if they would harm the convenience, vitality or viability of the town centre.

21.91 In the main towns in the District there has been a tendency for non-retail uses, such as building societies and estate agents, to take over some of the prime town centre locations. When these uses are grouped together the area can become less attractive and convenient to shoppers undermining its retail function. Many of the non-retail uses, especially service providers, are dependent upon the shops to attract trade and it is important therefore that a proper balance is maintained to ensure the vitality and viability of the town centre. Hot take-away food shops can also have a serious impact on the character and quality of town centre shopping areas through noise, smell, litter and disturbance. Within the primary shopping frontages permission will not normally be granted for the change of use of ground floor premises from retail to non-retail uses unless it can be demonstrated that this would not be harmful to the existing character or primary shopping function of the area.

### **SH2 - Primary Shopping Frontages**

Within the Primary Shopping Frontages, as defined on the Proposals Map, permission will only be granted for the conversion or change of use of the ground floor of existing shops to non-retail uses where the proposed use would not undermine the retail function, character, vitality and viability of the Primary Shopping Area. Proposals will be required not to adversely affect the amenity of the surrounding area through noise, smell, litter, traffic or disturbance arising from late opening hours.

21.92 A sequential approach should be taken to sites for new retail and retail related development, for example drive-through restaurants. The sequential approach identifies preferred locations which must be considered before out-of-centre sites. The first preference is for town centre locations (within the Town Centre Shopping Area), followed by edge-of-centre sites and only then by out-of-centre sites provided that they can be made accessible by a choice of means of transport and will not adversely impact upon nearby centres. It is however, recognised that existing out of

town stores will continue to provide a form of retailing which both adds to local shopping choice and is popular with the public. Proposals for the refurbishment and redevelopment with small scale extensions of out of centre stores may be acceptable where there is insufficient net gain in retail floorspace to have an adverse effect on other established centres. In determining the scale at which retail impacts assessments are required the Council have taken advice and established a threshold figure of 500 square meters above which assessment will be needed.<sup>72</sup>

### **SH3 - Large Stores and Retail Related Uses in Area Centres**

Permission will be granted for new retail developments including extensions to existing stores where these are within the established Town Centre Shopping Areas of Area Centres as defined on the Proposals Map. Only if there are no sites that are suitable or viable for the proposed use and likely to become available within a reasonable period of time within a Town Centre Shopping Area will edge of centre sites be considered. Only if no such sites are available and suitable within either of these locations will sites elsewhere within the Built-Up Area Boundaries be considered.

Large retail developments of over 500 M<sup>2</sup> that are proposed on sites outside of a defined Town Centre Shopping Area will be required to demonstrate that it would not have an unacceptable impact on centres within the catchment of the proposed development either in itself or when considered cumulatively with other existing or proposed developments of a similar type. New retail developments will not be permitted where they would be on land allocated for other uses unless satisfactory alternative provision for such uses can be made elsewhere within the immediate locality.

- 21.93 Many towns in the District contain local, or neighbourhood, shopping centres outside the town centre and there are local shops in rural areas and in villages. These vary widely across the District, but their role in providing convenience shopping facilities to the local community, particularly for those people without the use of a car, is invaluable and should be maintained. The diversity of provision makes it impractical to define neighbourhood centres on the Proposals Map or provide specific measures that could be used to define them. However, they are areas where a group of shops, typically supplying a range of goods and services, is located. There is some scope for improving the local centres and for the provision of local shops or sub post offices in new housing estates or older estates lacking retail facilities. The opening hours of local shops within residential areas may be restricted to ensure that local amenities are safeguarded.

<sup>72</sup> Advice from GVA Grimley (2011) – Addition to East Devon Retail Study – Update 2011.

#### **SH4 - Neighbourhood Centres and Shops**

The council will grant permission for shopping development in village and neighbourhood centres which enhances their retail or service role and is of a scale to serve the local area only. Permission will also be granted within Built-up Area Boundaries, for new local facilities predominantly selling convenience goods, of a scale to serve new residential areas or older housing areas provided the vitality and viability of no existing centre is prejudiced.

Development proposals for local retail development shall meet the following criteria:

1. Each unit will not exceed a scale to serve more than the local area.
2. The operation of the retail unit will not be detrimental to the amenity of neighbouring residents by reason of undue noise, smell or traffic.
4. The development can be served by a variety of means of transport, including by foot and bicycle and will not result in excessive traffic generation.
5. The development will not, either alone or cumulatively, impact upon the vitality or viability or any nearby centre.

#### **Use of Upper Floors of Shops**

- 21.94 The under-use of upper floors of commercial properties can lead to lack of maintenance to the detriment of the fabric and appearance of the building. The Council seeks to retain the economic resource and housing supply that upper floors can provide and which contributes to the vitality of shopping centres. Accordingly the District Council will not usually permit any application which includes a proposal to remove separate accesses to upper floors. It should be noted that planning permission is not always needed for some changes in use class.

#### **SH5 - Use of Upper Floors in Shopping Developments**

The District Council will permit the use of upper floors of premises in Town Centre Shopping Areas for residential, community or commercial purposes subject to:

1. In the case of commercial or community development, no loss of self contained or purpose built residential accommodation with all basic amenities.
2. The preservation of any existing separate access to floors above ground level and provision for storage of refuse.
3. The viability of the retail use not being undermined.

#### **Village Shops and Post Offices**

- 21.95 Village shops and Post Offices provide for the essential day to day convenience shopping needs of the local community. They offer important retail facilities in particular for the elderly and less mobile. Village public houses often provide a focus for community life and reduce the need to travel. Rural communities should have reasonable access to such facilities particularly as public transport is limited in these areas. The Council will seek to resist the loss of local shops and services where this would result in a significant or absolute loss of facilities to a community.

21.96 It is difficult to reinstate shops, in the same or other premises, when they have changed to other uses. It is not however, always possible to prevent their closure when it is uneconomic for their use to continue. Therefore proposals involving the loss of local shops or services will only be permitted where the District Council is satisfied that the existing use is no longer viable and there is no market for the business as a going concern. In order to demonstrate this, the Council may seek information regarding the marketing of the business and its accounts. The Council will seek to retain the shop front in circumstances where permission is granted to enable the premises to be reinstated as a shop should the future opportunity arise.

21.97 The Council encourages the provision of new shops within villages.

#### **SH6 - Change of Use of Village Shops or Services**

Existing retail and service provision within villages should be maintained and potential providers of future retail development within villages will be encouraged to make provision of a scale and nature appropriate to local needs.

Proposals which would result in a significant or total loss of shops, Post Offices, Public Houses or other services to the community will not be permitted except where the existing provision of a use of this nature is no longer viable and there is no market for the business as a going concern. A vigorous economic assessment will be undertaken to establish the potential and viability of any specific concern and marketing of any property or business will need to include offering to the local community for their acquisition/operation.

Permission to change the use of a shop will be subject to the retention of the shopfront.

#### **Shops in the Open Countryside**

21.98 Rural shops are defined as shops in which the majority of goods sold are produced on the premises. This is defined as a minimum 60% to ensure that any shop is reasonably linked to the use of the land instead of forming a general retail outlet. Farm shops can provide a valuable local facility, an additional source of income for farms and can help sustain the rural economy. However, they should not become an alternative to shops which are better located and more accessible and convenient in town and village centres.

21.99 Rural shops, garden centres and nurseries can become large commercial enterprises, supplementing food and plant sales with other, related goods such as crafts, sheds, conservatories and furniture. This will be controlled to prevent the sale of unrelated goods and applications for general retail sales and additional services such as cafes will only be permitted where they are ancillary to the sale of gardening or horticultural goods or products grown on the property to which the shop or nursery relates.

21.100 Rural shops, garden centres and nurseries may develop an urban appearance as they expand and the number and size of buildings increase, hard surfaced display areas are extended and additional car parking is required. Such developments would

generally be harmful to the high quality East Devon landscape and would generate additional traffic which may not be safely accommodated on local roads. Any proposals for the provision of new farm shops, garden centres or nurseries or the expansion of existing enterprises will therefore, be strictly controlled.

- 21.101 The Local Plan will promote retail development in rural areas where products are sourced or manufactured locally as this will allow diversification in agricultural businesses and promote local food production. The criteria set out in the policy will aim to protect the viability of town centres in the District as these are centres not only for retail but service trades, leisure facilities and other public amenities. Town centres serve more than just their immediate locality and there protection is important for those accessing services from the surrounding areas.

#### **SH10 - Retail Development in Rural Areas Outside Built-up Area Boundaries**

In order to protect the viability of town centres in the District yet support local businesses, retail development in rural areas will be permitted only where it directly relates to an existing rural business like a shop associated with a farm business, garden centre or nursery or a showroom associated with a rural based business, subject to: a minimum of :

- a) 60% (or more) of the produce/products for sale is/are produced on the premises or holding.
- b) No more than 30% of the produce/products are sourced and produced from within a 16 km (10 mile) radius of the business.
- c) No more than 10% of the produce/products are from elsewhere.

and subject to:

1. The scale and type of retail shop proposed will not adversely affect easily accessible convenience shopping available to the local community.
2. The proposal does not harm the rural character of the landscape or the amenities of the locality.
3. The local road network and access to the site can safely accommodate the extra traffic generated by the proposal.
4. The car parking will be proportionate to the scale of the development and the layout and siting will be sympathetic to the surroundings.
5. The scale and scope of any additional services will be restricted to ensure that they are ancillary to the main use.

#### **Tourism in East Devon**

- 21.102 The changing nature of the holiday industry will in some areas generate pressure for proposals for hotels and other forms of tourism related accommodation. The Council is keen to ensure that new tourist accommodation is directed toward the most sustainable locations and identifies the towns and villages of the District, as defined by those settlements with Built-up Area Boundaries, as best fulfilling this requirement. The only exception to this will apply in respect of the use of existing buildings in the open countryside and particularly as related to small-scale farm and rural diversification.

- 21.103 Unless used for tourism related purposes rural buildings could be left unused, whilst conversion of rural buildings to holiday accommodation use can, when skilfully undertaken, involve minimal external alteration and avoid the need for additional garaging facilities. For such development to be acceptable it is important that schemes are sensitively located, taking full account of existing curtilages, and subject to careful landscaping and design in order to mitigate against potential adverse environmental impacts. Building conversion is considered further in the Design and Development Chapter of the Local Plan.

#### **TO1 - Proposals for Holiday or Overnight Accommodation and Associated Facilities**

Proposals for hotel development, conversion of dwellings into self catering accommodation, guest houses and upgrading of existing holiday accommodation will be permitted within the Built-up Area Boundaries of towns and villages provided the following criteria are met in full:

1. The scale, level and intensity of development is compatible with the character of the surrounding area, including adjoining and nearby settlements.
2. The proposal does not harm the amenities enjoyed by the occupiers of neighbouring properties.
3. On-site servicing and parking facilities are provided commensurate with the level and intensity of the proposed use.
4. The proposal is accessible on foot, by bicycle and public transport and will not impair road safety or the free flow of traffic.

Conversion or use of existing buildings in the open countryside, within close proximity to the main farm house or country house, for small-scale holiday accommodation uses will be permitted where compatible with the above and also with Policy D10 of the Design and Development Chapter of the plan.

- 21.104 The District Council is particularly keen to ensure the continued vitality and viability of the tourism industry in the resorts. It is important that the principal holiday resorts continue to appeal to tourists and offer a full range of holiday accommodation with associated bars, restaurants and leisure facilities in order to maintain their character, atmosphere and image. Accommodation in the principal resorts of East Devon includes hotels, guest houses, public houses, self catering apartments and holiday cottages. Principal Holiday Accommodation Areas are defined on the Proposals Maps for Exmouth and Sidmouth and loss of hotels providing holiday accommodation in these areas will be resisted.
- 21.105 It is acknowledged that a change in the nature of the tourism trade has resulted in changing demands for holiday accommodation. In certain circumstances the upgrading of existing properties to provide fewer bedrooms but with en-suite facilities has led to a reduction in the number of holiday units. Policy does not seek to prevent positive changes to holiday accommodation and it is accepted that some reduction in the number of holiday units may result. Policy does however, seek to prevent the loss of accommodation and the loss of floor space in accommodation use to non-tourism uses, notably residential development.



## **TO2 - Principal Holiday Accommodation Areas**

Within the Principal Holiday Accommodation Areas, as identified on the Proposals Map, the change of use or redevelopment of hotels and other forms of holiday accommodation to non-tourism accommodation uses will not be permitted unless:

1. there is no physical or economic potential for continued tourist use. And/or
2. refurbishment or redevelopment for holiday accommodation purposes is not financially viable. And/or
3. development proposals would result in environmental and/or economic benefits to the area that would outweigh the loss of the tourist accommodation.

Within the Principal Holiday Accommodation Area proposals for change of use from residential to hotels or other forms of holiday accommodation will be encouraged.

21.106 The Principal Holiday Accommodation Areas afford specific protection to holiday accommodation uses in specified areas in Exmouth and Sidmouth. Hotels elsewhere in these resorts and in Seaton provide holiday accommodation which is important to their tourism function. Holiday accommodation elsewhere in the District is also essential to maintain a viable tourism base and takes a range of forms, including hotels, chalets, camp sites, caravan sites and bed and breakfast establishments. The loss of holiday accommodation to non-tourism uses will generally be to the detriment of the tourism appeal of East Devon and therefore loss will be discouraged. In many instances planning permission granted on properties for holiday use will be conditioned to prevent changes of use to non-holiday uses. Policy sets the context for consideration of proposals involving the loss of holiday accommodation within the holiday resorts of Exmouth, Seaton and Sidmouth as a whole.

## **TO3 - Loss of Holiday Accommodation**

The proposals for change of use or redevelopment of hotels and other holiday accommodation in the seaside resorts of Exmouth, Budleigh Salterton, Seaton and Sidmouth will not be permitted unless the holiday use is no longer viable and there is no market for the business as a going concern and/or the new use will overcome clear social, economic or environmental problems associated with the current use.

21.107 It is recognised that Holiday Accommodation Parks are a key feature within the tourism sector. The expansion of existing sites and potential development of new sites will have a positive effect on the economy of East Devon. This should not be to the detriment of the natural environment and those in settlements close to the proposals. Criteria within policy is designed to safeguard the key concerns of such developments and identify areas of mitigation should permission be granted.

#### **TO4 - Holiday Accommodation Parks**

Outside of designated landscape areas, proposals for new sites and extensions of existing sites will be permitted where they meet the following six criteria:

1. The proposal relates sensitively in scale and siting to the surroundings and includes extensive landscaping and visual screening to mitigate against adverse impacts. They do not affect habitats or protected species.
2. They are within, or in close proximity, to an existing settlement but would not have an adverse impact on the character or setting of that settlement or the amenities of adjoining residents.
3. They would not use the best and most versatile agricultural land.
4. They will be provided with adequate services and utilities
5. Traffic generated by the proposal can be accommodated safely on the local highway network and safe highway access to the site can be achieved.
- 7 The development will be subject to the provisions of plan policy in terms of sustainable construction and on site renewable energy production.

Proposals for the extension of existing caravan and camping sites or the addition of related and ancillary facilities on existing sites, within designated landscapes, will only be permitted where they meet the above criteria in full and provide no new permanent structures or are replacement structures designed to blend into their surroundings.

#### **Visitor Attractions in East Devon**

- 21.108 Visitor attractions should make imaginative use of the natural, archaeological, historic or architectural features of the area without damaging them. The District Council is keen to support such tourism initiatives, particularly as they will generally accord with the principles of 'green tourism' and may help to extend the holiday season as well as providing for the recreation and leisure needs of local residents. The Council will view favourably proposals where a high priority is placed on protection and/or restoration and where sensitive measures are put forward in the provision of new or upgraded facilities.
- 21.109 Major tourist attractions in East Devon in terms of visitor numbers include Stuart Line Cruises, Crealy Park, National Trust Properties, Otterton Mill, Seaton Tramway, Pecorama and World of Country Life.
- 21.110 The designation of much of the coastline as a World Heritage Site is likely to generate demand for additional tourist attractions, which may include visitor centres, educational and interpretation facilities. Applications for new tourist attractions will require particularly careful consideration given the need to balance potential benefits to the local economy from increased visitor numbers against the need to protect the high quality landscape within which they will be located.

#### **TO6 - Provision of Visitor Attractions**

Proposals for the provision of new tourist attractions or sites or extensions to existing tourist attractions and sites will be permitted provided that:

1. There is no significant adverse impact on the surrounding landscape and features or on any areas of natural, cultural or heritage interest.
2. The proposal relates sensitively in scale and siting to the surroundings and includes appropriate landscaping to mitigate against adverse impacts.
3. The locality is capable of accepting increased numbers of visitors without giving rise to problems related to access, road safety or congestion.
4. The site may be accessed by a variety of means of transport.
5. There is no significant detrimental effect on the amenity of nearby residents.

Proposals in the open countryside will be permitted where they are compatible with the above, they relate positively to natural or semi-natural features of the rural environment and they, would lead to rural economic diversification in rural locations.

#### **Sport and Recreation**

21.103 High land values have led to pressure to build on playing fields and other open spaces, particularly within urban areas. The Council recognises that communities need recreation space and that existing public gardens and playing fields, private and school/college playing fields, play areas and other public and private open space areas are an important community resource that the Local Plan seeks to safeguard.

#### **RE1 - Retention of Land for Sport and Recreation**

Proposals that would result in the loss of open space currently or previously used for recreation and/or sports uses, play areas or playing fields will not be permitted unless:

1. Alternative provision of equivalent community benefit is made available and will be appropriately laid out by the applicant as a replacement. Or
2. Sports and recreational facilities can best be retained and enhanced through the redevelopment of a small part of the site. Or
3. There is an excess of public open space, children's play areas or sports pitch provision in the area as the case may be.

21.104 Additional recreational facilities may be required in respect to new residential development and may be sought in respect to other forms of development. An emphasis in facility provision will be sought in locations where a clear deficiency in facilities currently exists.

21.105 With regard to motor sport facilities Sport England identifies two sites within East Devon as being of regional importance - Smeatharpe Stadium (stock car racing) and Dunkeswell (kart racing). Given the concern regarding noise intrusion associated with these sites the Council is opposed to any further similar developments in these localities.

## **RE2 - Open Space, Sports Facilities and Parks**

Within or adjoining urban or built-up areas, permission will be granted for new open space areas, sports facilities and parks, the accommodation of the visual and performing arts, and the upgrading or enhancement of existing facilities provided the following criteria are met:

1. They do not unduly affect the character and appearance of the area and the visual and physical amenities enjoyed by adjoining residential areas.
2. They are accessible by public transport, bicycle and on foot.
3. Appropriate car and cycle parking is provided.
4. The proposed road access to the site provides for safe exit and entry and the local road network can safely accommodate the extra traffic the proposal would generate.
5. The facilities are located without detriment to the best and most versatile agricultural land, nature conservation interest and the conservation of areas of landscape, scientific, archaeological or historic interest.

## **Allotments**

21.106 Allotments are seen as a valuable asset in promoting greater sustainability within local communities and are recognised as being of particular importance in urban areas, especially where individual gardens may be small in size.

21.107 The need for additional allotments depends on local factors. Given the likely costs of land acquisition and the limited financial resources available to the District Council any case made for additional allotments would need to be subject to very careful consideration. Proposals involving the development and thus resulting in the loss of allotments must have regard to considerations of demand and conveniently located alternative sites.

## **RE4 – Allotments**

Permission will not be granted for proposals involving the loss of allotments for other development unless there is insufficient demand for allotment use or appropriate alternative sites can be provided.

## **Countryside Recreation**

21.108 The changing nature of agriculture and the need for rural diversification has focused attention on alternative uses of land within the countryside. In this respect the provision of outdoor recreation facilities is of particular relevance. This type of development can have a significant visual impact on the character of the landscape and the surrounding countryside. It is also acknowledged that proposals can provide opportunities to improve the environment and to create wildlife habitats.

21.109 Some uses, such as horse riding, will be encouraged where they can be accommodated safely and are not detrimental to the countryside but their associated services and paraphernalia will need to be controlled. Dwellings in the open countryside will not be justified on the basis of a recreational need.

### **RE5 - Recreation Facilities in the Countryside and on the Coast**

Planning permission will be granted for outdoor recreation facilities in the countryside provided that the nature of the activities undertaken or the space requirements of the proposal require a countryside or coastal location and:

1. The facilities or development proposals are in scale with the character, environmental characteristics and setting of the area and do not conflict with countryside, nature or landscape policies, nor detract from the amenities of the area.
2. The proposals allow for safe access and discreet parking arrangements, particularly in environmentally sensitive areas, and do not result in the loss of or cause unacceptable disruption to existing public rights of way.
3. On site facilities should be appropriate to meet the needs of the proposal and links with adjacent footpaths and bridleways should be suited to any proposed site uses.

Where indoor areas are required use should be made of existing buildings. Any new buildings and necessary extensions should be limited in scale and be in close proximity to existing groups of buildings or an existing settlement. Where it is proposed to extend or intensify an existing use the cumulative effect of the use will be considered in the interests of the character of the area.

### **Community Facilities and Buildings**

21.110 Facilities such as schools, libraries, halls, health and sports centres fulfil an important role as a focus for social activities taking place in the local community. Community centres and village halls are already established in many settlements in East Devon, and wherever possible the Council will encourage the further development of these existing facilities. The demand for a community centre has been established in Exmouth and Honiton and a centre is being built in Sidmouth.

### **C1 - Community Buildings**

New community facilities and buildings will be accommodated on sites that lie within or adjacent to Built-up Area Boundaries. Where residential development intensifies the need for community buildings a developer contribution towards their provision or the upgrading of existing buildings will be sought.

### **New Community Facilities**

21.111 It is essential that in areas where substantial new development is proposed, and in areas lacking facilities, that provision be made for community and education facilities. Consideration should be given to the establishment of multi-purpose buildings that accommodate a variety of uses and users. Example include Post Office, cyber-cafe, health visitor, playgroup, facilities for the elderly and a range of clubs and societies. The definition of community facilities does not include residential development, either in isolation or as a means of providing community facilities.

21.112 The Council will encourage the temporary use of a residential house or other appropriate building for community activities in the following instances:

- i) Where there is a perceived demand which needs to be proven prior to the construction of a permanent community facility.
- ii) Where a large development is proposed and a building is required to encourage an embryonic community facility to establish at an early stage of construction. In this case the developer will be required to make the provision.

21.113 The Council will not permit the construction of a new residential house to be used temporarily for community purposes, where a residential use would conflict with other policies of the Local Plan. An instance of this is outside Built-up Area Boundaries, within open countryside. Any planning permission for new community facilities may be granted on a temporary basis. It may limit the type of activity carried out in the building and/or the hours of operation.

## **C2 - Local Community Facilities**

Proposals for new facilities, extensions and/or alterations to existing facilities to serve the local community will be permitted on sites within or adjoining Built-up Area Boundaries provided they meet the following criteria in full:

1. The proposal would be compatible with the character of the site and its surroundings and in villages with the rural character of the settlement.
2. The proposal will be well related to the built form of the settlement and close to existing development.
3. The site is accessible by a variety of types of transport, including walking and cycling and the amount of traffic generated by the proposal could be accommodated on the local highway network without harming road safety.
4. The proposal would not be detrimental to the amenity of neighbouring residents by reason of undue noise or traffic.

In the countryside, outside defined Built-up Area Boundaries, proposals will only be permitted if they meet the above criteria and a need for the facility has been proven.

Planning Permission will not be granted for developments that would result in the loss or closure of a community facility unless the community facility is no longer needed or is not viable or an alternative facility of equal or higher value is being provided.

## **Shared Community Facilities and Buildings**

21.114 Educational buildings have been shared successfully for a number of years, particularly by the District's Community Colleges where the school has priority use of buildings and facilities but the community has access to them at agreed times. This makes an important contribution to recreation and education provision and reduces building and operational expenses. The Council recognises the substantial benefit this offers, particularly in smaller communities, and will consider grant aiding such schemes where a need can be proven.

21.115 Dual use of education premises reinforces the importance of a school within the local community and encourages life long learning. To date, school libraries, halls, places of worship and sports facilities have been successfully shared. Many schools offering



evening and weekend vocational and non-vocational classes. The Council also encourages increased access to private sports and recreation facilities by the public.

### **C3 - Shared Community Facilities**

In order to ensure that land is used efficiently and effectively, to ensure that facilities become a vibrant focus for community activities and to enable access by a wide section of the community, proposals for new community facilities, both public and private, will be expected to be capable of dual-use, as considered appropriate by the community and unless local circumstances indicate that dual use is not appropriate.

Proposals for new community facilities in villages and rural areas should share existing premises wherever possible.

### **Potentially Hazardous Developments**

21.116 Certain sites and pipelines are designated as notifiable installations by virtue of the quantities of hazardous substance stored or used. The Plan area already contains a number of high-pressure natural gas pipelines and other sites where hazardous substances are stored or used. Whilst they are subject to stringent controls under existing health and safety legislation it is considered prudent to control the kinds of development permitted in the vicinity of these installations. For this reason the Planning Authority has been advised, by the Health and Safety Executive, of consultation distances for each of these installations. Planning permission for development involving the use, movement or storage of a hazardous substance will not be granted if it would increase the risk to the health and safety of users of the site, neighbouring land or the environment.

### **C4 - Notifiable Installations**

Proposals for development within a notified consultation zone around a hazardous installation will be permitted only if there is no health and safety risk to that development.

### **Telecommunications**

21.117 Telecommunications are of great importance to the economy and we need to accommodate the growth of new and existing systems. The Council generally shares this view. However, owing to the potentially obtrusive nature of telecommunication installations, wherever legally and technically possible, the Council will encourage the sharing of existing masts, buildings and other structures such as electricity pylons in order to limit the proliferation of unsightly development, particularly in visually sensitive locations. To achieve this the District Council will encourage pre-development and pre-application discussions between operators and will expect confirmation that the cumulative exposure will not exceed the International Commission on Non-Ionising Radiation Protection (ICNIRP) standards. Where the sharing of a mast will require it to be extended the District Council may consider the sharing of an existing site to be preferable in environmental and visual amenity terms.

In proving a need for new telecommunications development, applications should be supported by technical evidence such as radio coverage plots.

21.118 The future telecommunication requirements of a new development should be given careful consideration at the design stage in order to minimise visual intrusion, not adversely affect the amenity of nearby residents, allow for easy maintenance and future growth. In accordance with advice in PPG 8 developers will be expected to demonstrate that there are no suitable alternative locations before consideration will be given to proposals within Areas of Outstanding Natural Beauty.

21.119 Because telecommunications is a rapidly expanding and evolving technology can become obsolete. It is a requirement under the 1984 Telecommunications Act for redundant apparatus to be removed.

### **C7 – Telecommunications**

In considering applications for the installation of telecommunications systems, the Council will have regard to the following criteria:-

1. The development should be sited, well designed and landscaped to minimise the visual impact on the surrounding area while taking due account of operational efficiency.
2. The development will not adversely affect the amenity of nearby residents or significantly impact upon their enjoyment of their homes
3. New antennas will, wherever technically and legally possible, share existing masts or be erected on existing buildings or other structures. Where the sharing of a mast will require its extension the District Council may alternatively consider the sharing of the site.
4. The development will not have a serious adverse effect on areas designated for their landscape or nature conservation value.
5. The development will not have a significant impact on radio reception which cannot be mitigated.
6. The development will not have a serious adverse effect on the character, appearance and setting of a conservation area, listed building, historic park or garden, ancient monument or site of archaeological interest.
7. The development will have no adverse effect on aviation safety.
8. There is an identified need for the development in the local area.

Proposals to erect masts or towers will not be permitted unless the applicants can demonstrate that they have attempted to use sites with low environmental impact or share masts and have been unsuccessful.

Any planning permission granted will be conditioned so that when any facility ceases to be used, becomes obsolete, or falls into disrepair, the demolition and removal of all works undertaken, both above and below ground, and the reinstatement of the site to its original condition or to an agreed specification, will be required.

## **Access to Facilities and Transport**

- 21.120 One of the key means by which the District Council can most positively influence travel and movement patterns is through promoting development in the most sustainable locations. Such locations will be where people can make realistic and viable alternative choices to the use of the private car. New developments, particularly where they may attract large numbers or volumes of people, should be located and designed so as to be accessible by, and encourage the use of, walking, cycling and public transport. In particular, development requiring a high level of access like schools, hospitals, town centres and major shopping developments should be located near to public transport services. Development in such locations will give people the choice of using more sustainable means of transport than the car. It will also increase the accessibility of these facilities to people who do not have regular use of a car including the disabled, elderly and children. Where developments will have significant transport implications a transport assessment will be required to be submitted with any planning application. For major proposals this will illustrate accessibility to the site by all modes of transport and the likely modal split of journeys to and from the site. It will also give details of proposed measures to improve access by public transport, walking and cycling and as such reduce the need for parking associated with the proposals and also to mitigate against adverse transport impacts.
- 21.121 Notwithstanding the importance of non-car modes of transport it is recognised that vehicular access will be an essential requirement for most developments, especially in rural areas. Therefore, when considering development proposals the Council will take into account accessibility to the site and the traffic movement implications of the proposal within the development site and on the surrounding area. For major developments, there will need to be demonstration that roads, footpaths, car parking, open space and other associated works have been comprehensively planned for in order to assist the safe and convenient movement of people.
- 21.122 Roads and footpaths associated with new development must be constructed to a good safe standard. Advice on the design of residential estate roads is given in DOE/DTP Design Bulletin 32: Residential Roads and Footpaths (1992), the Companion Guide to DB32: Places, Streets and Movement (1998) and Devon County Council's own publications 'Residential Estates Design Guide' and 'Commercial Estate Design Guide'. The Council will have regard to this planning guidance and emerging good practice in road design when considering development proposals that include new roads and footpaths. Proposals for development will be expected to meet these standards in order for the highway to be considered suitable for adoption by the Highway Authority. This guidance allows for a variety of designs and layouts. It is essential that all aspects of movement are planned comprehensively since the design of car parking, footpaths, open space, play areas and landscaping all affect convenience and safety. Special attention should be paid to ensuring that new developments which are accessible by members of the public should provide satisfactory access to persons with reduced mobility, including persons with limited ability to walk, persons with impaired sight and persons with prams and pushchairs. New proposals must not undermine the mobility of people with disabilities.

#### **TA1 - Accessibility of New Development**

New development should be located so as to be accessible by pedestrians, cyclists and public transport and also well related to compatible land uses so as to minimise the need to travel by car. Where proposals are likely to attract large numbers of visitors they must be accessible by public transport available to all sectors of the community. Development involving the creation of public open space, car parking area, highways and other areas to which the public have access, must provide adequate provision for persons with reduced mobility.

21.123 Traffic Management, including traffic calming, can be used to improve road safety, reduce congestion and generally enhance the quality of the environment. It may involve a wide variety of measures including; the introduction of lower speed limits, street restrictions and pedestrian priority schemes. Traffic management techniques are particularly appropriate in town centres where over the years the movement of pedestrians has become progressively restricted due to the increasing volume of vehicular traffic. Today shopping trips are too often blighted by congested footpaths along equally congested streets with all the related pollution and noise that such traffic congestion generates.

21.124 It is the intention of the District Council, in conjunction with the County Council, to improve the overall environmental quality of the main shopping streets in East Devon by removing extraneous traffic, calming residual traffic and introducing suitable traffic management measures. The main desired effect of such measures is to 'reclaim' key shopping streets for pedestrian use whilst allowing the safe passage of essential vehicular traffic. Where possible traffic management measures will be implemented with other environmental enhancement policies in the form of a comprehensive Town Centre Management Plan. Schemes have been carried out in Sidmouth and Axminster and proposals have been completed in Exmouth with further schemes are planned.

#### **TA2 - Traffic Management Schemes**

The Council, when considering development proposals in town centres will seek the introduction of traffic management schemes when one or more of the following objectives can be achieved:

1. Safe and efficient movement of the mobility impaired, pedestrians, cyclists and vehicles.
2. Alleviation of congestion.
3. Reduction of traffic conflict and accident potential.
4. Reduction of delays to public transport.
5. Reduction of environmental damage by traffic.

#### **Walking, Cycling and Horse Riding**

21.125 Walking and cycling are important for recreation purposes, health, the environment and as a means of entertainment or to travel to work or school. The improvements proposed for pedestrians in town centres are referred to in the text of this plan and for

all short trips walking is the most important mode of travel. The South West Coast Path, a 1,014 km (630 mile) national trail from Minehead to Poole Harbour, passes along the East Devon Heritage Coast. The East Devon Way is a 64 km (40 mile) inland recreational walking route of regional importance running from Exmouth to Lyme Regis and which showcases the landscape and wildlife importance of the East Devon AONB. It offers opportunities for sustainable tourism and the potential to spread the impact of tourism to the less well known inland areas of the district.

- 21.126 As with walking, cycling is a particularly sustainable form of transport, and is a suitable alternative for motorised transport for short and medium journeys, particularly those less than 5km (3 miles). It is acknowledged that opportunities for improving cycling provision in rural areas are limited though it is stressed that quiet roads, unmetalled roads and bridleways can make excellent cycle routes. Much of East Devon is hilly but flat hill tops and valley floors can provide good cycling. Where opportunities arise the District Council will encourage measures to provide, improve and extend facilities for both cyclists and pedestrians. Such measures taken together with efforts to improve public transport can reduce the reliance placed on the private car. In addition, safe and secure cycle parking will be required for certain developments in accordance with policy.
- 21.127 The District Council has developed a network of on-road cycle routes and a 160 kilometer (100 mile) long round East Devon route "The Buzzard Route", which incorporates part of the National Cycle Network (Route 2), together with 10 inter-linking shorter routes. With adjoining authorities the Council has also developed a number of other cycle routes in the Blackdown Hills. Devon County Council are developing National Cycling Route Two in the District and in East Devon this will run alongside the Exe Estuary from Exeter to Exmouth and on Eastward to Sidmouth, Seaton and Axminster before heading into Dorset. There are also a series of other long distance routes. The Wessex Coast to Coast Cycle Route is proposed between Weston-Super-Mare and Seaton. These schemes will contribute towards the District Council's long term objective of providing a comprehensive network of cycleways and the District Council will work with Devon County Council and other interested organisations in the development of a high quality cycle network within East Devon.
- 21.128 Disused railway lines can offer great potential as cycleways. They follow routes that avoid steep gradients, make use of existing infrastructure and often pass through attractive countryside away from busy highways. They can therefore be ideal routes for cyclists which, if developed, would have considerable tourist and recreational potential. New cycle routes have been opened and are planned in East Devon in conjunction with work undertaken with Sustrans.
- 21.129 The Council is conscious of the needs of horse riders and current difficulties of accommodating them. Where possible means will be investigated of making provision on shared and/or separate routes.

#### **TA4 - Footpaths, Bridleways and Cycleways**

Development proposals will be required to include measures to provide, improve and extend facilities for pedestrians and cyclists commensurate with the scale of the proposal. Footways and routes for pedestrians and cyclists within and through new development schemes will be encouraged. These measures may include both shared and exclusive surfaces to provide safe, convenient and attractive routes, and must be designed to take account of the needs of persons with restricted mobility. Wherever possible the opportunity should be taken to join, upgrade and extend existing or proposed networks.

Development which would result in the loss, or reduce the convenience or attractiveness of an existing or proposed footpath, cycleway or bridleway, will not be permitted unless an acceptable alternative route is provided.

#### **Safeguarding of Former Transport Routes**

21.130 Disused railway lines offer huge potential for re-use as future walking, cycling or public transport routes. As such their continuity should be protected from development which may impact on the future provision of such a route. Even a small development on the route can interrupt continuity and so undermine the potential of the whole route.

21.131 Within East Devon there are a number of former railway lines with potential as transport or recreation routes. These routes are listed below:

- i) Feniton – Budleigh Salterton – Exmouth.
- ii) Stoke Canon – Thorverton.
- iii) Sidmouth – Tipton St. John.
- iv) Axminster – Uplyme.
- v) Colyton – Seaton Junction.

#### **TA5 - Safeguarding Disused Railway Lines**

The Council will support initiatives from Devon County Council ,and other bodies, to secure new footpath and cycle way links and where practical, especially where costed programmes of work are in place. The Council will resist the granting of Planning permission for development on undeveloped sections of disused railway lines which have potential for re-use as a transport and recreation route, if it prejudices the future ability of the route to perform this function.

#### **Park and Ride Services**

21.132 There have been proposals for “park and ride” systems in East Devon and the Council are supportive, in principal, of “park and ride” provision. A “park and walk” facility is offered from the District Council’s car park at The Knowle, Sidmouth on a Saturday and Sunday.



#### **TA6 - Park and Ride and Park and Share/Change**

The Council will support the provision of “Park and Ride” and “Park and Share/Change” facilities where their location and design will:

1. Maintain and improve accessibility for all sectors of the community.
2. Reduce the environmental impact of the private car on the local community.
3. Encourage the use of more energy efficient modes of transport.

In all instances proposals will need to be sympathetic to and unobtrusive in their landscape setting. And a demonstration of need must be shown.

#### **Highway Access**

21.133 The M5 Motorway and Trunk Roads in the District are part of the National Road Network and are administered by the Highways Agency on behalf of the Department for Transport (DfT). The M5 and A30/A303 form a part of the Trans European Road Network. A very extensive rural minor road network also exists in East Devon comprising of County, Primary and Secondary Routes, Local Distributors, Collector Routes and other minor roads and country lanes.

21.134 An important consideration in determining proposals for development will be their relationship to the existing highway network and, in particular, the suitability of the approach roads and access to the development site. This is of particular importance in East Devon where much of the highway network consists of narrow country lanes unsuitable to serving further development. Control of access points on to major roads is also essential to maximise the operational capacity and safety of the highway network. Where practical direct access on to primary routes should be avoided. The type of access provided should reflect the type of road involved and the volume and character of traffic likely to use it. Developers are strongly advised to consult the Highway Authority at an early stage to obtain further advice on the possible highway implications of their proposal.

21.135 The construction of a new access or improvements to an existing access required to serve a new development may involve the carrying out of work some distance from the application site. For instance, an important element in the design of any access is the provision of adequate visibility splays to allow for the safe movement of vehicles. The provision of these visibility splays will often require the developers having control over significant lengths of frontage either side of the proposed access point. Where this land does not form part of the application site or is not in the ownership of the applicant the developer will be required to demonstrate that agreement has been reached to accommodate the works needed. For smaller developments where visibility splays are unlikely to be adopted by the Highway Authority developers will be expected to demonstrate that the required highway improvements can be provided and maintained to the satisfaction of the District Council.

#### **TA7 - Adequacy of Road Network and Site Access**

Planning permission for new development will not be granted if the proposed access, or the traffic generated by the development, would be detrimental to the safe and satisfactory operation of the local, or wider, highway network.

Where new development requires off-site highway improvements any planning permission granted will be subject to a planning obligation requiring these works to be carried out either by the developer, or through an agreement with the Highway Authority to ensure that:

1. The required highway improvements are included in, and, will be constructed as an integral part of the development or are part of a programmed improvement scheme to be undertaken by the Highway Authority. In the case of programmed schemes the planning permission will be subject to a condition delaying its implementation until the highway improvements have been carried out.
2. The applicant is in a position to secure the implementation of the required highway improvements.

#### **Land for Highway Improvements**

21.136 Trunk road improvement schemes are dealt with by the Department for Transport which carries out its own separate public consultation exercises including, if necessary, the opportunity for any unresolved objections to be heard at Public Inquiry.

21.137 Other highway improvements together with other more minor schemes are typically promoted by Devon County Council through the Local Transport Plan. Planned Transport schemes at which land is 'safeguarded' from other developments are detailed in policy.

21.138 The County Council has approved a route for completion of Dinan Way at Exmouth between Hulham Road and Exmouth Road. An alternative alignment, closer to Summer Lane, has been the subject of public consultation but no final decision over the route has been taken. A safeguarded area is shown on the Proposals Map within which one of the two possible routes is proposed to be implemented.

#### **TA8 - Safeguarding of Land Required for Highway and Access Improvements**

Land required for the following highway and access schemes will be safeguarded from other development.

##### **Road Schemes**

1. Completion of Dinan Way at Exmouth. The extent of safeguarded land is indicated on the Proposals Map.

##### **Other Access Improvements**

2. Exmouth, town centre to seafront – enhanced pedestrian route.
3. Honiton, Heathpark to Sidmouth Road – pedestrian and cycle link.
4. A373 Awliscombe, Sunnyside to village – footway.
5. Sidmouth to Sidford, The Byes – cycle route extension.
6. Sidford to Sidbury – pedestrian and cycle route.
7. A3052 Harpford to Newton Poppleford – footway/footbridge.
8. Exeter to Broadclyst – cycle route.
9. Exeter to Clyst St Mary and Westpoint – cycle route.
10. B3174 Clyst Honiton to Airport and Business Park – footway and cycle route.

#### **Parking Provision**

- 21.139 Nearly all new developments will generate need for some new parking. Policy of the Local Plan seeks to accommodate car parking provision commensurate with the type, size and location of development occurring.

#### **TA9 - Parking Provision in New Development**

Spaces will need to be provided for Parking of cars and bicycles in new developments. As a guide at least 1 car parking space should be provided for one bedroom homes and 2 car parking spaces per home with two or more bedrooms. At least 1 bicycle parking space should be provided per home.

In town centres where there is access to public car parks and/or on-street parking lower levels of parking and in exceptional cases where there are also very good public transport links, car parking spaces may not be deemed necessary.

All major developments should include charging points for electric cars.

- 21.140 To facilitate the reduction in traffic congestion along main shopping streets it is the objective of the District Council to improve rear service provision for shopping and commercial areas where opportunities for doing so arise. This may involve improvements to existing highways.

#### **TA10 - Rear Servicing of Shopping/ Commercial Development**

In determining applications for shopping and commercial developments, including redevelopment, in town centres, the Council will expect the provision of a rear service access where practicable, and where the capacity of roads to the rear of main shopping frontages is or can reasonably be made adequate.

#### **Roadside Service Facilities**

21.141 The roadside service facility along trunk roads or motorways should provide essential services for drivers, including: free short term parking for cars, cars towing caravans, coaches and goods vehicles, fuel, public toilets, refreshment facilities and rest areas. Larger developments could also include facilities for overnight accommodation and picnic areas. Any retail facilities for convenience shopping, other than for fuel and associated motoring products, will need to be compatible with the shopping policies of the Local Plan.

#### **TA11 - Roadside Service Facilities**

Any proposal for a roadside service facility along a trunk road and motorway will only be granted planning permission if it meets the following criteria in full:

1. It offers a range of essential services appropriate to the route it serves;.
2. It is appropriately spaced in relation to other roadside service facilities.
3. Access to the trunk road or motorway including any connection to the local road network, and the internal circulation is satisfactory.
4. It is sited, designed and landscaped to minimise impact on the character and appearance of the landscape.
5. It does not cause a material loss of amenity to nearby residents.
6. It should be capable of serving traffic travelling in both directions on the route.
7. The design of new or improved accesses or other necessary trunk road works should be sufficient to accommodate anticipated traffic flows up to 15 years after the opening of the development.
8. Proposals for roadside facilities along trunk roads that are the subject of major improvements will not be granted planning permission unless they will be compatible with the future highway design.

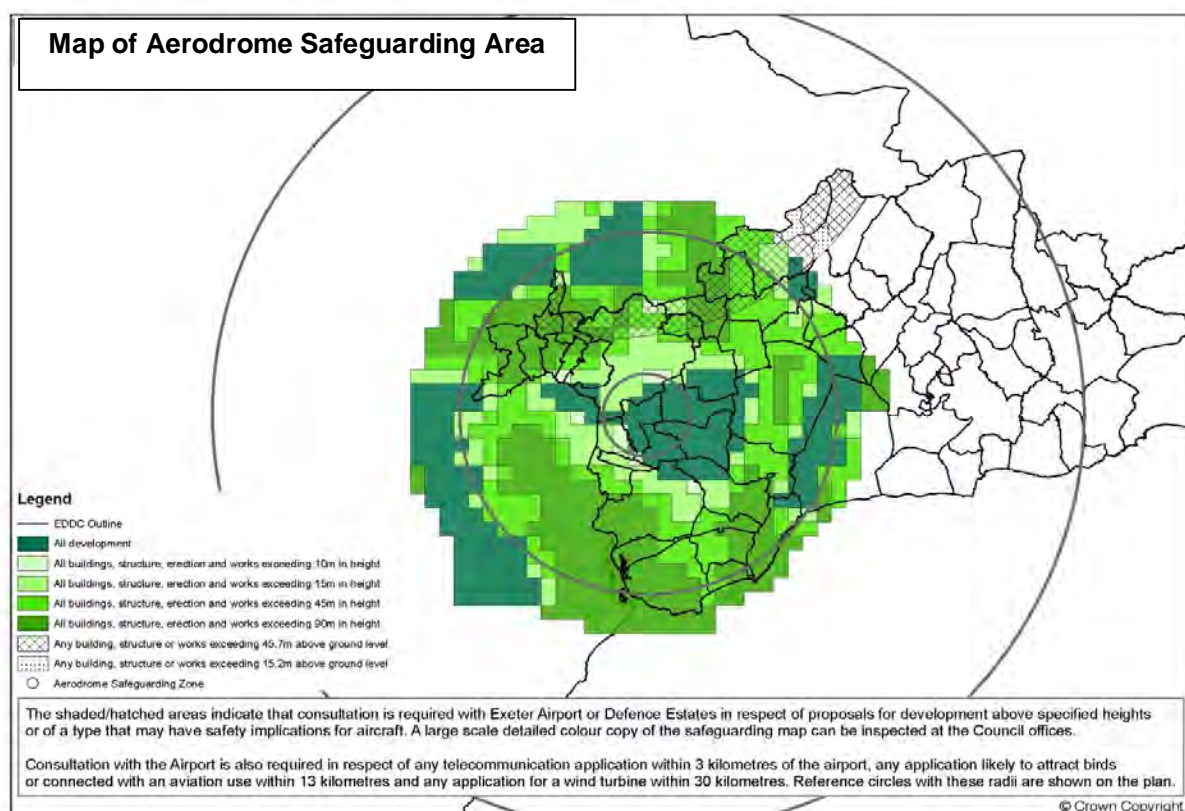
New roadside service facilities along other routes constituting the high quality road network should be located on sites within the identified Built-up Area Boundaries, and meet criteria 1, 2, 3 and 5 above. Upgrading of existing facilities on this network will need to be compatible with criteria 1, 2, 3, and 5 above.

## **Aerodromes and Safeguarding**

- 21.142 The Civil Aviation Authority has identified a safeguarded area around Exeter International Airport and Dunkeswell Airport in East Devon. In addition, a further safeguarded area around a MoD facility in Mid Devon affects the Northern part of the plan area. In these areas the Council will consult with the Civil Aviation Authority and the airport operator on planning applications for certain types of development, in accordance with guidance set out in ODPM Circular 1/2003. Built development involving high structures, buildings which may interfere with radio signals, or development which may create a bird strike hazard may be subject to restrictions. The safeguarded areas are neither the responsibility nor the proposal of the Local Planning Authority.
- 21.143 Public Safety Zones have been identified by the Department for Transport on land adjoining the runways to Exeter International Airport. A Public Safety Zone is an area within which the annual risk of fatality to a permanent present individual due to an aircraft accident is not less than 1 in 100,000. Within this area there is a smaller zone, where the individual fatality risk is 1 in 10,000. DfT Circular 1/2002 advises that there is a general presumption against new or replacement development or changes of use of existing buildings within Public Safety Zones. In particular no new or replacement dwellings, mobile homes, caravan sites or other residential buildings should be permitted within a Public Safety Zone. Other forms of development may be acceptable, provided they do not reasonably expect to increase the number of people living, working or congregating in the area.
- 21.144 The outer boundary of the aerodrome safeguarded areas and the public safety zones are identified on the Proposals Map. The Map Below shows the safeguarded areas.

### **TA12 – Aerodrome Safeguarded Areas and Public Safety Zones**

The outer boundary of the aerodrome safeguarded areas and the Public Safety Zones for Exeter International Airport are shown on the Proposals Map. Within these areas planning permission will not be granted for development that would prejudice the safe operation of protected aerodromes or give rise to public safety concerns.



## Local Initiatives in Axminster

21.145 The Webster Garage Site and adjoining land offers the scope to accommodate a very high quality scheme that will contribute in a positive manner to the commercial growth and vitality of Axminster. Every opportunity will need to be taken to secure links between the identified site, as shown on the Axminster Inset Map, and adjoining buildings and spaces. The site sits in the very centre of Axminster and affords a unique opportunity in the town for a commercially vibrant development. Given the site location it is essential that commercial development potential is not compromised or undermined, for this reason policy seeks to resist ground floor uses that will not add to commercial vitality unless they serve a community function.



#### **LAX1 - Webster Garage Site and Adjoining Land, Axminster**

Proposals for mixed-use redevelopment of the Webster garage site and adjoining land in Axminster, as identified on the Proposals Map, to incorporate retail, commercial, employment, residential and amenity uses will be permitted. A development brief will be produced for this site to promote positive redevelopment.

The granting of planning permission will be dependent upon a high quality comprehensive scheme that will be sensitive to the historic setting of the site and its location in Axminster. The scheme will need to respond positively to links to adjoining buildings and spaces and the design of the overall development scheme should explore potential for incorporation of adjoining buildings to the site into the development. All ground floor uses, other than access routes, will need to add to commercial vitality in the town or serve a community function. Residential uses will not fulfil this function and will be resisted at the ground floor level.

#### **Local Initiatives in Budleigh Salterton**

- 21.146 The absence of a footway along West Hill in Budleigh Salterton is identified as a road safety hazard. The provision of additional lengths of footway along this stretch of road is considered desirable, but West Hill is characterised by roadside trees and hedgerbanks and their retention will need to be balanced.

#### **LBS1 - West Hill, Budleigh Salterton**

The Proposal Map indicates those stretches of West Hill which lack a footway. When development or redevelopment takes place on land which includes these stretches of road, the developer will be required to provide a footway across the site to the satisfaction of the District Council, unless that would entail a serious loss of visually important trees or hedge bank.

#### **Local Initiatives in Exmouth**

- 21.147 The Proposals Map identifies as Land of Local Amenity Importance land in the valley of the Bapton Brook and land in the valley of the Withycombe Brook which will form Valley Parks. These parks will be used for informal activities such as walking, cycling, landscape enjoyment, wildlife study and picnicking. They also form an important visual amenity for nearby residents and act as wildlife corridors to the countryside. Whilst it is intended that there will be a continuous public footpath through each park, and in time, a cycleway, as suggested in the Exmouth Forum report. This will create safe access from the suburbs to the town centre schools and the surrounding countryside. There will not necessarily be public access to all parts of the Valley Parks.
- 21.148 The Council will seek to protect the landscape and wildlife habitats in these areas and improve access where appropriate. Development, other than for outdoor recreation, appropriate agriculture or forestry purposes, will be opposed. Where land is not owned or to be acquired by the Council management agreements will be sought with

the landowners to protect the landscape and wildlife value. Detailed proposals for the Valley Parks and their future management have been drawn up and been subject to public consultation. Comments received will be considered and any amendments made before the proposals are adopted and implemented.

#### **LEX1 - The Valley Parks, Exmouth**

Within the Valley Parks identified on the Proposals Map development other than that to provide a safe corridor for pedestrians and cyclists and for outdoor recreation will not be permitted.

21.149 Land between Bapton Lane and Pound Lane, currently in use as Greenfingers Garden Centre, forms an important link between areas of open space already in public ownership in the Bapton Valley. The site has been used for many years as a garden centre and the Council recognises that in general this use does not detract from the amenities of the area and has no objection to the use remaining and the business developing. However, it is important that if in the future the garden centre use ceases then the land comes into use as public open space.

#### **LEX2 - Greenfingers Garden Centre, Exmouth**

Land between Pound Lane and Bapton Lane is proposed as public open space to form part of the Bapton Valley Park if and when the present garden centre use ceases.

21.150 There is a need for local community centres in Exmouth, particularly in recently developed residential areas. Where community centres are proposed the District Council may require a feasibility study prior to either granting permission or allocating funds.

21.151 Areas of open space suitable for informal ball games have been provided in the more recently developed housing areas, at Knappe Cross, in the valley of the Withycombe Brook at Ashfield Close, and at Redgates. A further such area is proposed in the Plan on land North of Canterbury Way. There is lack of open space and recreational areas in the Town Ward.

#### **LEX3 - Open Space in Town Ward, Exmouth**

The Council will identify a site or sites for open space or play areas in The Town Ward following a study of the area.

21.152 The Exmouth Seafront is recognised as a key asset for the town and the Council will want to support its further enhancement. To this end, along with Devon County Council, the District Council appointed LDA Design to undertake a town centre and waterfront design study. The outputs from this study will need to inform and help refine policy. At this stage these draft policies are 'rolled-over' from the previous local plan. The Final LDA recommendations and conclusion from the study are due to be considered by the Council in late 2011.

#### **LEX4 - Exmouth Waterfront, Exmouth**

Exmouth Waterfront, from the Estuary car park to Orcombe Point, will be enhanced by:-

1. The provision of a continuous walkway and, as far as possible, cycleway along the seafront and Estuary side with links to the town centre.
2. The implementation of proposals for the various character areas of the waterfront based on the Exmouth Waterfront Study: Masterplan Report (January 2000).
3. The provision of co-ordinated street furniture, signage and information.
4. The redevelopment of the former outdoor pool site and the development of recreational opportunities.

Opportunities will be sought to provide safe, all tide boat launching and landing facilities, ideally with adjacent car and trailer parking recognising the dangers of existing slipway provision.

21.153 The District Council has long identified the Imperial Road car park, bus station, former British Rail Club, estuary car park and access roads as offering redevelopment potential for provision of community facilities in association with commercial development and improved public transport interchange facilities. A new library and multi-purpose community building have been raised as possibilities. Any scheme would involve significant improvements to the pedestrian link from this area to the town centre as part of a major enhancement scheme. A development brief for this area is to be prepared to promote its development potential.

#### **LEX5 - Imperial Road Car Park/ Bus Station/ Estuary Car Park, Exmouth**

The comprehensive redevelopment of the Imperial Road car park, British Rail Club, Bus Station, Estuary car park and lorry park and access road will be permitted provided that the scheme:-

1. Provides community facilities to serve the town as a whole.
2. Maintains and improves public transport interchange facilities.
3. Allows for the provision of an additional platform at the Railway Station.
4. Maintains or, if required by new facilities, increases the current level of public car parking.
5. Provides for a footpath and cycleway along the waterfront and for improved footpath and cycle links to the town centre.
6. Includes landscaping proposals to cover all public and communal spaces in the site;
7. Includes the relocation of the coach and lorry park.
8. Creates a significant visual enhancement to the key entrance to the town with the buildings and spaces designed to a high standard commensurate with their prominent position both in relation to the town centre and the sensitive environment of the estuary from which they will be open to view.

21.154 The London Inn Car Park, Post Office and yard, former gas holder site in Union Street and the builders merchant premises in Fore Street have potential to provide additional retail and commercial development, together with short stay car parking to support the regeneration of the town centre. It is recognised that the former gas

holder site and adjoining land, which forms part of a gas works, may be contaminated.

**LEX6 - London Inn Car Park, Post Office and Yard, Builders Yard, Fore Street and Former Gas Holder Site, Union Street, Exmouth**

Redevelopment of part of the London Inn Car Park, the Post Office and service yard and former gas holder site in Union Street and the builders yard in Fore Street will be permitted to provide mixed use development with retail and -commercial uses and short stay car parking with the broad disposition of land uses to be determined in a development brief.

21.155 Land at the rear of shops on the North side of the Parade was previously proposed for the Exmouth Urban Relief Road Stage II and the possibility of limited additional car parking on the under-utilised land in this area has been raised. Some reserved car parking spaces for local businesses have been created and further spaces could be provided but this would probably require relocation of business premises. The area would not be suitable for general public car parking without substantial improvements unjustified by the number of spaces that could be provided.

**LEX7 - Land Rear of the Parade, Exmouth**

The redevelopment of land at the rear of shops on the North side of The Parade to provide rear servicing and reserved car parking will be permitted.

21.156 The Council has recognised the potential for redevelopment of the Camperdown Depot and car park and adjoining land. This includes improved water access and a development brief for this area is to be prepared. It is proposed to relocate the Camperdown Car Park so it is adjacent to Langerwehe Way where, with greater public surveillance, it is likely to be better used.

**LEX8 - Camperdown Depots Area, Exmouth**

The land at Camperdown Depots, car park and adjoining land is proposed for comprehensive redevelopment with the broad disposition of uses to be determined in a development brief, provided the scheme:

1. Is suitable for a mix of uses including marine based industrial and commercial units and/or water-related community facilities taking into account the sensitive location. Residential use would only be appropriate as an ancillary use or above ground floor level.
2. Does not adversely affect the amenity of neighbouring residents by reason of smell, noise, litter or traffic.
3. Incorporates public access to the waterfront and contributes to the provision of a continuous footpath and cycleway between the recreation ground and the docks;
4. Includes provision for boat storage facilities.
5. Is designed to present an attractive frontage to the estuary having regard to its prominent position on the waterfront.
6. The present level of public car parking is maintained.

### **Local Initiatives in Honiton**

- 21.157 Land West of Honiton Station between the railway line and Marlpits Lane has potential for redevelopment for mixed uses. It would also provide the opportunity for improvements to passenger interchange facilities including bus facilities at the station as proposed in the Local Transport Plan.

#### **LH3 - Bradfords Builders Yard and land West of Honiton Station, Honitonh**

Redevelopment of Bradford's Builder's Yard and adjoining land South of the railway line and North of Marlpits' Lane will be permitted to provide mixed use development including improvements to passenger interchange facilities with the broad disposition of land uses to be determined in a development brief.

- 21.158 Land North and South of Chapel Street between the rear of properties in High Street and Queen Street has potential for redevelopment although access is difficult and the historic street pattern would need to be retained in accordance with Policy LH1. As a town centre site a mixed use development would be appropriate and there is potential for the provision of public open space to provide a quiet traffic free sitting area in a formal garden close to the town centre. A development brief was adopted as Supplementary Planning Guidance by the District Council in autumn 2004 and any proposals for new development within the area identified as LH4 on the Proposals Map should accord with it.

#### **LH4 - Land North and South of Chapel Street, Honiton**

Redevelopment of land North and South of Chapel Street will be permitted for mixed development which will include an integrated public garden in accordance with the development brief.

### **Local Initiatives in Seaton**

- 21.159 Over the past decade the Council with its partners has placed considerable effort on securing the implementation of the Seaton Regeneration Area proposals. The hard effort is now delivering key benefits for the town. The substantial edge of town centre supermarket is now open and a substantial land area has been raised and levelled and is available to accommodate residential/mixed use developments. Policy will provide for future development at the regeneration area.

### **LSE1 - Seaton Regeneration Area, Seaton**

Within the Seaton Regeneration Area, as defined on the Proposals Map, mixed use development proposals will be permitted to include the following:

1. Enhanced pedestrian and cycle access to and through the Regeneration Area, including linkages between the town centre, Seaton Marshes, sea front, Axe riverside and harbour.
2. Enhancement of community, leisure, tourism and recreation facilities, including the Seaton Tramway and Holiday Village.
3. Promotion of the harbour area as a distinctive gateway to Seaton.
4. Retail and commercial frontage development along Harbour Road and The Underfleet, complementing town centre facilities.
5. Employment floorspace within the mixed-use areas.
6. Residential development, involving a variety of dwelling types and sizes, to accommodate approximately 400 units.
7. Flood management measures for land currently within indicative floodplain.
8. Measures to retain nature conservation interest within the Northern area of the regeneration area and to enhance neighbouring areas of conservation importance.

Planning permission for individual schemes will be granted provided mechanisms are in place that will achieve the delivery of a comprehensive regeneration scheme for this area. Necessary and reasonable developer contributions towards infrastructure, affordable housing, public realm, visitor and community facilities will be a priority for the delivery of regeneration.

21.160 Land with planning permission for employment uses at Harepath Road is shown on the Inset Map. Additional land totalling 2.2 hectares has been allocated for employment uses at Harepath Road to serve the future needs of the town and to reverse the net outflow of the work force of Seaton to employment elsewhere together with providing an alternative site for businesses which may wish to relocate from the Seaton Regeneration Area in the future. This employment land is proposed in conjunction with land for recreation uses as part of a mixed use area within local Policy LSE 2.

### **LSE2 - Harepath Road Mixed Use Area, Seaton**

Within the Harepath Road Mixed Use Area development proposals for high-quality employment development and recreation uses will be permitted.

The employment development should constitute no more than 55% of the overall mixed use area and should be sited, designed and landscaped to minimise the visual impacts on the Green Wedge. The area proposed for recreation development will provide for open recreation uses to meet the recreational needs of Seaton. Landscaping and planting of the Northern-most part of the Harepath Road Mixed Use Area will be required to provide a landscaped edge to the Green Wedge to minimise the visual impacts of development on the area.



### **Local Initiatives in Sidmouth**

21.161 Industrial traffic to and from the Alexandria Industrial Estate uses the residential Alexandria Road and Pathwhorlands and the latter road is narrow and without footways. An access road from Bulverton Road (B3176) into the estate would relieve these roads of industrial traffic and provide a safer access.

#### **LSI4 - Access to Alexandria Industrial Estate, Sidmouth**

Proposals which would significantly increase the vehicular use of the substandard Pathwhorlands will not be permitted. Further development of the Alexandria Industrial Estate and adjoining land will require the provision of a new access road to the B3176 Bulverton Road.

**TO MAKE COMMENTS ON CHAPTER 21:  
THE DEVELOPMENT MANAGEMENT POLICIES  
OF THE LOCAL PLAN visit:  
[www.eastdevon.gov.uk/draftlocalplan21](http://www.eastdevon.gov.uk/draftlocalplan21)**



## **PART THREE – NEIGHBOURHOOD PLANNING**

The District Council is committed to supporting local communities to produce Neighbourhood Plans. Once adopted these Plans will ensure that planning decisions reflect the aspirations and needs of local communities. Neighbourhood Plans must follow the strategic, overarching, policies of this Local Plan, as set out in Part One of this document. However communities can decide whether to follow the Development Management Policies of the Local Plan (Part Two of this plan) or establish their own, locally specific, ones.



## 22 Neighbourhood Plans

### What is a Neighbourhood Plan?

- 22.1 The Localism Act 2011 will reform the planning system to give people new rights to shape the development of the communities in which they live. A new type of community-led planning initiative known as a **Neighbourhood Plan** will set out policies on the development and use of land in a parish or 'neighbourhood area'. Once such a plan is made and adopted it will become a main consideration within the planning system.

#### Neighbourhood Planning Policy

East Devon District Council will support and encourage Parish and Town Councils, and if accepted in law local community groups (Neighbourhood Forums), to produce Neighbourhood Plans for their Parishes and/or defined neighbourhoods.

Neighbourhood Plans must show how they implement the strategic policies (Part One) of this Local Plan but can choose to supersede or over-right all or any of the Development Management Policies (Part Two) of this plan.

- 22.2 The District Council recognise that some communities have a wish to have a greater say in where development is located and the type of development built and may wish for additional development to help deliver a new facility. Neighbourhood Plans provide the means to achieve this.
- 22.3 Neighbourhood development plans could be very simple, or go into considerable detail, and local communities would also be able to grant full or outline planning permission through a **Neighbourhood Development Order** in areas where they most want to see new homes and businesses, making it easier and quicker for development to go ahead.
- 22.4 There is a sub-category of Neighbourhood Development Order, called a **Community Right to Build Order**, which will provide for community-led site development.
- 22.5 In order for any Neighbourhood Plans or Orders to be adopted they will need to conform with planning policies and guidance at the local, national and European level. They will also need to demonstrate support from the local community.
- 22.6 It will be the responsibility of the plan producers to define what and how their plan says and how they produce it. We set out below some guidance on how the process may be undertaken. It is stressed that there will be legislative requirements associated with plan production, including an Examination and referenda. These will be required to be complied with and also and depending on the nature and location of any proposal there may be other statutory and legal requirements and procedures that must be complied

with. East Devon District Council will provide technical help and assistance, where possible.

### **Neighbourhood Planning: the stages of the process**

- a. The parish or town council initiates the Neighbourhood Plan and identifies the area to be considered. If the area covers more than one parish then all relevant parish councils must consent.
- b. The Neighbourhood Plan is developed by the community, but East Devon District Council is required to cooperate with its preparation. It is submitted to East Devon District Council.
- c. East Devon District Council may decline the draft plan if it includes '**excluded development**', or is the same or similar to a proposal that has failed in the previous two years with no change of planning context that would alter the assessment.
- d. East Devon District Council then appoints a suitably qualified person, agreed with the applicant, to act as an independent examiner. The local authority pays the costs of the **examination**, which will be through written representations unless the examiner considers it necessary for oral evidence to be heard on one or more of the issues.
- e. The examiner approves or rejects the application on criteria which include the following:
  - Whether **the referenda area** should be the neighbourhood area or needs extending .
  - Whether the proposal is '**in general conformity with the strategic policies in the development plan for the area**'.
  - Meets conditions that may apply in terms of sustainable development (to be defined in the **National Planning Policy Planning Framework**).
- f. The examiner can recommend modifications so that it meets the basic conditions laid out above and can then recommend it is submitted to a referenda.
- g. East Devon District Council can decline the order at this stage but on strictly limited grounds and may refer the relevant issues back for a second examination.
- h. East Devon District Council, if it accepts the verdict of the examiner, must then arrange and pay for a **referenda** in the area as originally defined or modified by the examiner, but can further extend the referenda area if they wish.
- i. If the proposal achieves support from more than 50% of the vote at the referenda, East Devon District Council makes a **neighbourhood development plan or order**. In the case of an order, any proposed development that is consistent does not need to apply for full planning permission, though the Neighbourhood development Order itself defines who can give permission and what conditions might be applied.

- 22.7 It is important that Policy Section of East Devon District Council are involved in this process from a very early stage to offer guidance and support and to ensure that the Neighbourhood Plan is in conformity with Local Plan and other policies.



### **What are the benefits?**

- 22.8 Developing a Neighbourhood Plan can help communities to play a greater role in shaping the future of their area. It will bring together residents, businesses, local groups, landowners and developers to share ideas and build consensus about what needs to be accomplished in the area. It can also help to create lasting partnerships both within and outside the community with public service providers, third sector organisations or development companies. Neighbourhood Planning offers communities a direct route for including their own local planning priorities and aspirations within the broader planning system.
- 22.9 Neighbourhood Plans can also offer an opportunity to conserve and enhance the “special sense of place” that imbues most of our towns and villages, recognising the essential shared culture and experience of where residents live. This could include things such as the field where community events happen, special views, landmark trees or orchards where a local type of apple are grown. These things may be difficult to identify until they are under threat and may be of little worth, other than saving a shared sense of place for the community.
- 22.10 Neighbourhood Plans will incorporate conservation and enhancement measures as well as opportunities for those places linked to widely acknowledged cultural, traditional or historical events and activities, of importance to the distinctiveness and shared value of that community.

### **Who should be involved?**

- 22.11 The parish or town council for the area needs to initiate and lead the process, but the involvement, throughout the process, of a broad range of local stakeholders will help to strengthen community support for the plan and make its implementation easier.
- 22.12 The following is a list of stakeholders that the parish/town council should seek to involve in the process:
- Residents
  - Community organisations
  - Councillors
  - Businesses
  - Landowners
  - Developers

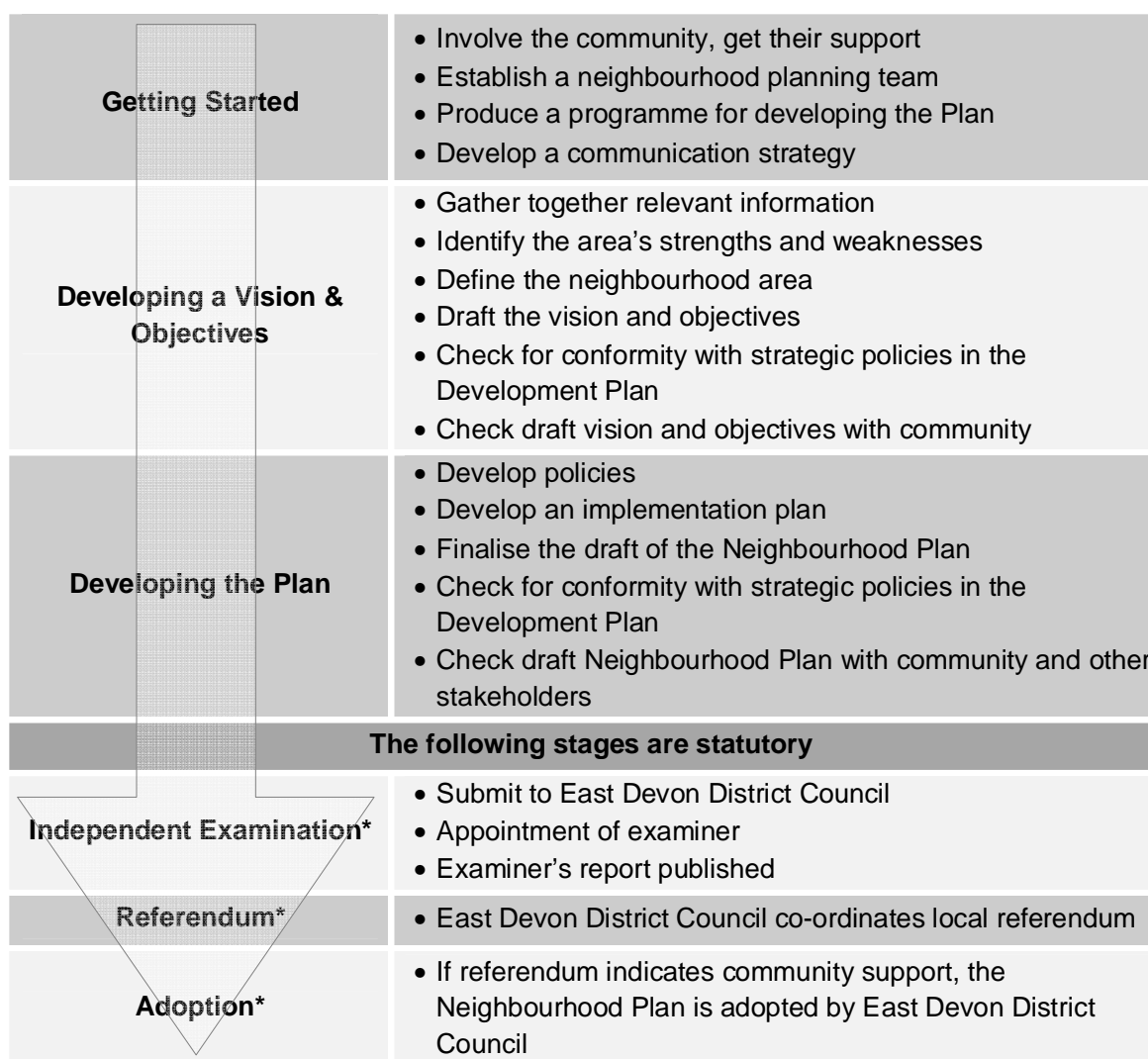
### **Others may also need to be involved.**

- 22.13 At certain stages it will also be necessary to involve officers from the East Devon District Council and, potentially, other public sector service providers such as Devon County Council, as the highway authority and education authority. They might be to provide advice, guidance or information on a particular matter or to comment on draft documents.

## How do you develop a Neighbourhood Plan?

22.14 There is no set process for producing the Plan, although there is plenty of good practice to learn from. Many areas have already produced Parish Plans and/or Village Design Statements and there is a wealth of expertise amongst local residents.

22.15 The ‘statutory’ stages in plan production largely occur when the Neighbourhood Plan has been drafted. The chart below summarises the steps that a ‘neighbourhood planning team’ could follow to develop a Neighbourhood Plan. The final three stages will be statutory, and are obligatory in this process.



## Getting Started

22.16 A Neighbourhood Plan should be community-led, with the Parish or Town council in charge. Successful plans rely on local leadership and participation.

## **Get the community on board**

22.17 If the community support the idea of a Neighbourhood Plan right from the start then it will be far easier to produce a document that reflects their priorities and aspirations, and that ultimately attracts their support at a referendum. The whole community should be informed about the Parish or Town council's intentions and given the chance to be involved from the start. This could include measures such as holding a public meeting to identify issues, asking for volunteers and writing to all residents and local organisations. Key to maintaining community support is plenty of good publicity and communications throughout the process.

## **Establish a neighbourhood planning team**

22.18 The parish/town council will need to set up a steering group (or neighbourhood planning team) to co-ordinate the project. This should consist of some parish/town councillors but wider representation should be sought from the community in order to create a Neighbourhood Plan that reflects the vision of the entire community. The more representative the neighbourhood planning team is, the better the plan is likely to be.

22.19 Additional representation on the neighbourhood planning team could be sought from:

- Residents.
- Representatives of community organisations.
- Business owners.
- Landowners.
- Hard to Reach groups, including the elderly, young people, working parents, disabled people.

22.20 It will be important for the Parish or Town council to consider the full range of skills, knowledge and experience that it requires in a neighbourhood planning team but too large a group will not be as effective. In selecting members of the team a process that is fair, open and inclusive will ensure a greater degree of community support.

22.21 If the Parish or Town council is holding a public meeting then this could be an ideal opportunity to recruit members to join the neighbourhood planning team. Once the team is in place it will be important to appoint a chairman, secretary and treasurer and establish the formal reporting process between the team and the main body of the Parish or Town council who will retain responsibility for the project. To help focus the work of the team members, it may be helpful to produce some simple terms of reference for the neighbourhood planning team.

## **Produce a programme for developing the plan**

22.22 Before embarking on the main activity of developing the Neighbourhood Plan, the team should produce a rough schedule of what it intends to do, this could include:

- What activities will need to be carried out at each stage?
- What resources will be needed to carry out these activities?
- How much time should be set aside to accomplish each stage?

- 22.23 This will help the team to focus and monitor its activity and estimate how much funding might be required. Government have suggested that they would see the process of developing a Neighbourhood Plan taking approximately one year.

### **Develop a communication strategy**

- 22.24 Communication and publicity with the wider community is vital throughout the process as people are more likely to participate if they are kept informed. With a Neighbourhood Plan the support of the community at the referendum stage is crucial to its adoption so the need to keep information flowing takes on an even greater significance.
- 22.25 The neighbourhood planning team may find it useful to create an informal and brief 'communication strategy', setting out how and when it means to inform and consult with the community and other stakeholders. Different ways of engaging the community include:
- Putting up posters or banners.
  - Delivering flyers through letterboxes.
  - Talking with neighbours, community groups and local businesses.
  - Use I.T. – Parish websites, social media and email groups.
  - Put regular notices in parish newsletters or magazines.
  - Contacting local media for major announcements.

### **Developing Vision & Objectives**

- 22.26 The first stage in producing the Plan will be developing a vision and objectives. The vision will be an overarching statement, or series of statements, describing what it will be like to live and work in the community in the future. A timescale of fifteen to twenty years is suggested. The objectives will set out what the community wants to achieve in order to help realise the vision. Detailed policies and actions can then follow from these objectives.

### **Gather together relevant information**

- 22.27 In order to help produce the vision and objectives for the area it will be necessary for the neighbourhood planning team to get a clear picture of the community's characteristics and understand whether there are any current or emerging proposals that will affect the area.

### **Community profiling**

- 22.28 This 'profiling' of the community will involve gathering statistical data on population size, household size, incomes, family composition etc. This helps to build up a social portrait of the community. Much of this information can be found on Devon County Council's website:
- [http://www.devon.gov.uk/index/councildemocracy/improving\\_our\\_services/facts\\_figures\\_and\\_statistics.htm](http://www.devon.gov.uk/index/councildemocracy/improving_our_services/facts_figures_and_statistics.htm)

### **Identifying Community ‘assets’**

- 22.29 It will be useful to identify all of the community’s physical assets and take note of their condition. This might include community centres, village halls, playing fields, sports facilities, footpaths or health facilities. This could be carried out by the neighbourhood planning team, and other volunteers, by organising a walk through the area to note these details. Often, community facilities are owned and managed by the local Council. Taking photos of these assets, and marking them on a map, could help to identify any issues.

### **Reviewing existing plans and strategies**

- 22.30 It will also be important to gather together information from any existing plans, strategies or studies that have a bearing on the community. These could include:
- Previous community-led plans developed in the area.
  - Local authority planning documents.
  - Devon County Council’s Local Transport Plan
  - Other strategies relating to housing, health, education and the economy, as produced by different public service providers.

### **Discussions with stakeholders**

- 22.31 It will be important for the team to establish contacts and have initial discussions with a range of stakeholders, to understand whether there are any other aspirations for the area that have not yet been developed into a plan or a strategy.
- 22.32 The team may wish to have discussions with:
- Local community organisations
  - Local businesses
  - Local landowners and/or their representatives
  - Officers at East Devon District Council and Devon County Council Officers and from other public agencies and service providers, as appropriate.

### **Identify the area’s strengths and opportunities for improvement**

- 22.33 Another important factor in developing the vision and objectives is to find out what people consider to be the community’s current strengths and weaknesses, so that improvements can be effected. The Neighbourhood Planning Team could consider:
- What are our strengths as a community?
  - What do we do well?
  - What can we improve or change in the community?
  - Do we need anything?
  - What resources (such as people, places, services, land) do we have?
  - What opportunities exist, are there any barriers to them?
- 22.34 The District Council has a great deal of experience in consultation and can offer advice. Different approaches to engagement could include:
- Survey (hard copy documents, web-based or door-to-door).

- Community event (workshop, exhibitions, combining with Parish Council meetings).
- Focus groups or discussions at meetings of local groups.
- Techniques tailored for different sectors of the community (such as an online survey for young people).

### **Define the area to be covered**

- 22.35 The neighbourhood area is the area to which the proposed Neighbourhood Plan (or Neighbourhood Development Order) will relate. It is likely in East Devon that most neighbourhood areas will follow parish boundaries. However, a neighbourhood area might be able to cover only part of a parish or a combination of parishes.
- 22.36 If the proposed neighbourhood area covers more than one parish, then consent must be sought from each of the affected Parish or Town councils. This will also have implications for representation on the steering group and the scale of community engagement that the process will require. Once the neighbourhood planning team is aware of the issues relating to development in the parish then it will be able to make an informed decision on what the neighbourhood area for the proposed Neighbourhood Plan should be.
- 22.37 A proposal for designating a neighbourhood area must be submitted by the relevant Parish or Town council(s) to East Devon District Council, for their approval, in the early stages of developing the Neighbourhood Plan.

### **Draft the vision and objectives**

- 22.38 As the Neighbourhood Plan will ultimately form part of the Local Plan for East Devon it would make sense for the vision of the plan to cover the same time period as that of the Local Plan for the area, which runs up until 2026.
- 22.39 The vision and objectives should be based on the information gathered through the processes discussed above. The neighbourhood planning team could draft a series of vision statements, setting out what it will be like to live and work in the area in 2026, or there could be one single vision statement that will describe this in fewer words. However it is drafted, it is important that the vision is realistic and achievable.
- 22.40 A typical Neighbourhood Plan vision statement might include topics such as:
- What the area will look like.
  - What facilities there will be (such as parks, GP surgeries, shops, schools) and what their qualities will be.
  - What the social and economic outlook for the area will be.
- 22.41 The objectives will be more specific and will set out how the vision will be achieved. For each element of the vision, there may be one or a number of objectives, depending on the different priorities of the community.



**For example:**

- Part of the vision may state that there will be '*accessible, high quality areas of green space that allow for recreation and social interaction amongst all age groups*'.
- An objective, leading from this, may be '*to seek the provision of an informal, outdoor recreation space, within easy, level, walking distance (approx 400m) from the centre of the settlement.*'

22.42 The Neighbourhood Planning Team may find that some of the information and responses it receives from the community doesn't really relate to the Neighbourhood Plan. These are still important issues for the community and could be addressed via a different route, for instance through an action plan for the Parish or Town Council to act upon.

**Check for conformity with strategic policies in the Development Plan**

Once the neighbourhood planning team has drafted a vision and objectives for the Neighbourhood Plan, it will be important to check that it does not stray too far from or offer a contrary position to the 'higher level' strategic policies for the area. A Planning Officer from the Planning Policy Team at East Devon District Council can advise the team on whether the draft vision and objectives are in general conformity.

**Check the draft vision and objectives with the community**

22.43 Before going further it is essential to check that the community supports the draft vision and objectives for the area. This endorsement could be sought by:

- Making copies available for public distribution and asking for comments.
- Meeting with community groups and asking for their feedback.
- Holding public meetings or drop-in events.
- Publishing information in the local newsletter/magazine/website and providing an address to receive peoples' feedback.

Following consultation on the draft vision and objectives, any necessary amendments can be made before moving on to developing the detailed content of the Neighbourhood Plan.

**Developing the Plan**

22.44 Once the vision and objectives have been drafted and approval has been sought from the wider community, the neighbourhood planning team can start to think about the detailed content of the Neighbourhood Plan. This will include policies, proposals maps and possibly an action or 'implementation' plan for the area. Again the neighbourhood planning team will need to check for conformity with strategic policies, with the support of the District Council Planning Policy team, and check that the content has local support.

## **Develop policies**

22.45 The Government is clear that the intention of Neighbourhood Plans is to set out policies on the development and use of land in a neighbourhood area. These must be credible, justifiable and achievable. In this respect, a Neighbourhood Plan is like the Local Plan for the district, but it is written for and applied at the parish level. The different policies that are developed within a Neighbourhood Plan may take one of the following forms:

- Policies may allocate specific sites for particular types and scales of development (such as for residential or employment uses).
- Policies may specify particular requirements relating to each or any allocation (such as access, landscaping, location of green space, assessments needed).
- Policies may specify sites within the neighbourhood area to be protected or enhanced as environmental assets or areas of landscape character.
- Policies may be more generic and apply to any future development within the neighbourhood area (such as local design policies, transport and access).

22.46 The neighbourhood planning team should start to draw up draft policies for inclusion within the Neighbourhood Plan. These should be based on the information gathered during previous stages of evidence gathering and community and stakeholder engagement and should ultimately seek to achieve the vision and objectives that have already been developed for the area.

22.47 For each objective that has been agreed, the neighbourhood planning team should consider what policies could be put in place to try and achieve them.

### **For example:**

- Continuing with the previous example, the objective is *‘to seek the provision of an informal, outdoor recreation space, within easy, level, walking distance (approx 400m) from the centre of the settlement.’*
- A policy leading from this may be, *‘An area of approximately 0.5ha off Church Street is allocated for recreational open space.’*
- Policies need to be achievable, and thought will need to be given to how the above example can be delivered – this will be brought out in the implementation plan, but could be through the Parish Council purchasing or leasing the land from the landowner, or perhaps in conjunction with development elsewhere in the Parish.

22.48 The need to ensure policies are achievable particularly applies to those that relate to the future use of particular sites within the area. The neighbourhood planning team should ensure that landowners are included in early ‘information gathering’ discussions and that negotiation takes place before sites are included.

## **Check conformity with strategic policies within the East Devon Local Plan**

22.49 Liaison with a Planning Policy Officer from the District Council at this stage will be particularly useful, to help identify what could be achievable in terms of developing policies within the Plan and to ensure that emerging policies are in conformity with the general strategy of the East Devon Local Plan.

## **Site Proposals Maps**

22.50 For site allocations and site-related policies, the Neighbourhood Plan will need to include a map showing proposed site locations and boundaries. The neighbourhood planning team may find it useful to produce these maps as it starts to draft the Neighbourhood Plan policies. Showing proposed locations on maps will help in any communication with the wider community and can assist in getting their views on particular sites. Parish or Town Councils may already have Ordnance Survey licenses and software, and so may already be able to produce and manipulate maps of the area. However, if not, there are other options available for having access to mapping which the District Council can advise upon.

### **Sustainability Appraisal and Appropriate Assessment**

There is a legal requirement to undertake a Sustainability Appraisal on planning documents, before they become part of the adopted development plan for an area. A Sustainability Appraisal looks at the possible economic, environmental and social impacts of an emerging plan and should result in a final plan which has the least negative impact possible in an area.

22.51 Government has indicated that Neighbourhood Plans should be subject to this requirement, and so neighbourhood planning teams should be aware that the sustainability appraisal will need to be planned for early on in the process.

22.52 It is important that the appraisal is started when work starts on the plan, so that emerging ideas, content and policies can be assessed, in order to inform the final plan. If the sustainability appraisal is done too late, it will not be able to inform the final plan (increasing the risk of a legal challenge at a later stage).

22.53 Appropriate Assessment follows a similar principle and this is something that may be relevant to certain Neighbourhood Plans. This specifically considers the wider impacts of particular emerging policies and plans on European sites of ecological importance (Natura 2000 sites) within the area.

22.54 The Sustainability Appraisal and Appropriate Assessment need not be complicated. They are tasks on which the Planning Policy Officers at the District Council should be able to advise on.

## **Develop an implementation plan**

22.55 The neighbourhood planning team may also wish to draw up an implementation plan, showing what action is needed 'on the ground' in order to achieve the vision and objectives of the Neighbourhood Plan. This needn't be part of the main Neighbourhood Plan itself, but could form an appendix to the main document, which continues to evolve as actions progress and new ones emerge.

22.56 The implementation plan does not set out policies but contains actions that need to be undertaken in order to deliver the policies that are in the Neighbourhood Plan.

**For example:**

- Our policy from the previous example is, *'An area of approximately 0.5ha off Church Street is allocated for recreational open space.'*
- Actions within the implementation plan show how we will seek to achieve this. For example:
  - ACTION: Agree terms of lease/purchase with the landowner, to secure the land for recreational use.*
  - ACTION: Consult the community on potential designs for the site.*
  - ACTION: Secure funding for undertaking groundworks on the site.*

22.57 The implementation plan should contain actions that are SMART (Specific, Measurable, Achievable, Realistic, Timely). When developing actions, the neighbourhood planning team may wish to consider the following principles:

- Priority - is the action a high, medium or low priority?
- Responsibility - which organisation will lead on delivering the action?
- Timescale - by what date should the action be carried out?
- Partners - does the action require support from partners?
- Resources - is funding, or any other resource required?

Certain actions may require input and assistance from a variety of agencies and stakeholders (such as the District Council, landowners, other service providers), as well as groups from within the community. They should be consulted to ensure that they will carry out 'their' actions.

### **Finalise the draft of the Neighbourhood Plan**

22.58 Once the policies and implementation plan have been drafted, then the neighbourhood planning team can start to produce the Neighbourhood Plan. There is no rule on what a Neighbourhood Plan should look like, as long as it contains clear policy statements with accompanying maps, where needed. Any associated implementation plan could be an appendix to the document as could a report on the consultation that was undertaken in order to produce the plan.

22.59 At this stage, the neighbourhood planning team will also need to produce a simple report on the sustainability appraisal process (and Appropriate Assessment, if necessary) that it has gone through, explaining why the policies it has included in the plan are the most appropriate ones.

### **Check for conformity with strategic policies in the East Devon Local Plan**

22.60 It is advisable at this stage for the neighbourhood planning team to check their emerging policies and actions to ensure they are in conformity with the East Devon Local Plan. Hopefully, if there has been continued liaison with planning policy officers at the District Council then there shouldn't be an issue with lack of conformity. It would certainly be worthwhile for the neighbourhood planning team discussing their emerging policies and implementation plan with a planning policy officer before consulting the wider community.

### **Check draft Neighbourhood Plan with the community and other stakeholders**

- 22.61 At this stage, before submitting the plan to East Devon District Council, the neighbourhood planning team should check that residents, businesses and other stakeholders are happy with the content of the plan. Not only this, but the report of the Sustainability Appraisal (and Appropriate Assessment, if necessary) should also be made available for comment.
- 22.62 As well as getting the views of local groups and residents, the neighbourhood planning team should look to consult wider stakeholder organisations that traditionally have a valuable input into plan-making. It will be important to consult organisations such as East Devon District Council, Devon County Council, the Environment Agency, South West Water, Natural England, Devon and Cornwall Constabulary and English Nature as well as the local community and adjacent town or parish councils. These organisations can offer valuable advice and guidance on the content of the plan as it relates to their particular disciplines.
- 22.63 Once consultation has been carried out an analysis of comments should be made and the neighbourhood planning team should consider whether any amendments need to be made to the draft plan before submitting it to East Devon District Council, ready for the independent examination.

### **Independent Examination - Submit to East Devon District Council**

- 22.64 Once the neighbourhood planning team has made any necessary amendments to the Neighbourhood Plan, it should submit the plan to East Devon District Council, along with a summary of the proposals. The Council will conduct a check of the plan, to ensure that the process has been followed in accordance with the requirements of the Localism Act. If the District Council is happy that the plan meets these requirements, it will arrange for the independent examination of the document.

### **Appointment of Examiner**

- 22.65 East Devon District Council will decide, in collaboration with the neighbourhood planning team, on who to appoint to undertake an independent examination of the Neighbourhood Plan. The examination will be paid for by the District Council. The main function of the examination will be to check that the Neighbourhood Plan conforms with:
- The strategic content of the Development Plan.
  - The National Planning Policy Framework and/or other national guidance.
  - European Directives.
  - National and international designations.
  - Neighbouring Neighbourhood Plans.
- 22.66 In general, the examiner will consider written representations during the examination period, rather than oral representations. However he/she may decide that an oral

representation is preferable in certain situations. In this case a public hearing must be held.

### **Examiner's report published**

22.67 The independent examiner produces a report with one of the following recommendations:

- that the draft Neighbourhood Plan should proceed to a referenda.
- that it should proceed to a referendum, subject to certain amendments.
- that the proposed Neighbourhood Plan should be refused.

22.68 If the examiner recommends that the draft plan should proceed to a referenda, the report may also recommend that the area to be subject to a referenda is extended beyond that of the parish in question, if certain policies would impact upon other nearby communities.

22.69 The report will be issued to both the Parish or Town council in question and East Devon District Council, who will arrange for its publication. The District Council will consider the examiner's report to decide whether or not the recommendations should be followed. The Council will publish its decision and will notify the Parish or Town council in question.

### **Referendum**

22.70 Assuming East Devon District Council decides that the draft Neighbourhood Plan should proceed to a local referendum, then they will co-ordinate and pay for it. The referenda will normally be open to any individual registered to vote in the parish, but could be extended.

22.71 A referenda is required to gauge community support for the Neighbourhood Plan. If the majority of those who vote on the adoption of the Neighbourhood Plan vote favourably, then the Plan will be adopted by East Devon District Council.

22.72 It should be noted that under the legislation it may be possible for the District Council to adopt a Neighbourhood Plan and thereby negate the need for a referenda.

### **Implementing & Monitoring the Plan**

22.73 Once the Neighbourhood Plan has been adopted within East Devon District Council's Local Plan, then it becomes a part of the statutory development plan against which relevant planning applications will be determined.

22.74 Applications can occur at any time, but the neighbourhood planning team will wish to ensure that activity on the ground is progressed, in order to hasten any developments and meet the objectives of the Neighbourhood Plan. The Parish or Town council will find it valuable to monitor the Neighbourhood Plan and associated implementation plan, to check progress in terms of meeting the community's objectives. If actions require the input of external partners (such as landowners, developers or East Devon



District Council) then the Parish or Town council will want to ensure that named contacts in these organisations are able to help progress the work, in the time required.

- 22.75 The Neighbourhood Plan will need to state what time period it covers, and this should be a decision for each community that produces one. However, it would seem prudent to follow the time period of the Local Plan, up until 2026. The Neighbourhood Plan could be updated before this time but it could be that the process will need to include further consultation and possibly an examination and referenda.

#### **Support Available**

- 22.76 As highlighted throughout this guidance East Devon District Council is able to offer support to communities developing Neighbourhood Plans. The extent and type of support may change over time.

**TO MAKE COMMENTS ON CHAPTER 22:  
NEIGHBOURHOOD PLANS visit:  
[www.eastdevon.gov.uk/draftlocalplan22](http://www.eastdevon.gov.uk/draftlocalplan22)**

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