

Broadclyst Parish Council



Neighbourhood Development Plan

2022 to 2031

Made Version July 2023

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Foreword

I have been involved with the development of the Broadclyst Parish Neighbourhood Development Plan (NDP) for several years now as a member of various working groups, so it is with no little satisfaction, pride (and relief!) that we are approaching its completion.

The Broadclyst NDP will form part of the legally binding framework for planning. However, whereas the national and district plans in the framework are “top-down”, our NDP is a community-led “bottom up” framework developed by parish residents who have together produced a series of policies to guide the development of our parish in the coming years.

Our community-developed plan enables us to be proactive in how our Parish develops taking, into account local needs and wishes. It represents the community’s vision and priorities for how we want the local area to develop in the coming years. Locally defined policies allow development to take place in ways which are resilient to climatic, health, and economic shocks and to the significant and rapid increase in our local population. These policies guide the provision and enhancement of green space, low-carbon transport infrastructure, housing to satisfy local needs, and local employment opportunities - with all proposed development subject to Design and Climate Change policies.

In addition to the policies guiding planning development, the NDP contains the associated community actions and projects identified by parishioners for which funding such as from the Community Infrastructure Levy can be utilised and national funding schemes can be sought.

A debt of gratitude is due to the many people who have contributed to the development of our NDP - steering group members, parish and district councillors and officers and not least all the parishioners of Broadclyst who responded to the many consultations and public events which have helped shape the plan.

SE Vaughan March 2021

Resident of Broadclyst Parish.

Introduction

Neighbourhood Planning: a brief history

1. Neighbourhood Plans (NPs) were introduced under the Localism Act 2011 as part of a suite of new community rights. They are a new tool to give more control over the type, location, size, space and design of development in a community area.

2. NPs sit within a planning framework as shown in Fig1. These Plans come underneath the umbrella of national planning policy in the Government's National Planning Policy Framework 2021 (NPPF)¹ and National Planning Practice Guidance² (NPPG). Other important planning documents which govern specific issues are the Minerals and Waste Plans³ produced at the county-wide level, and the Local Plan⁴. An extra level is set out to show what documents are used in assessing planning applications.

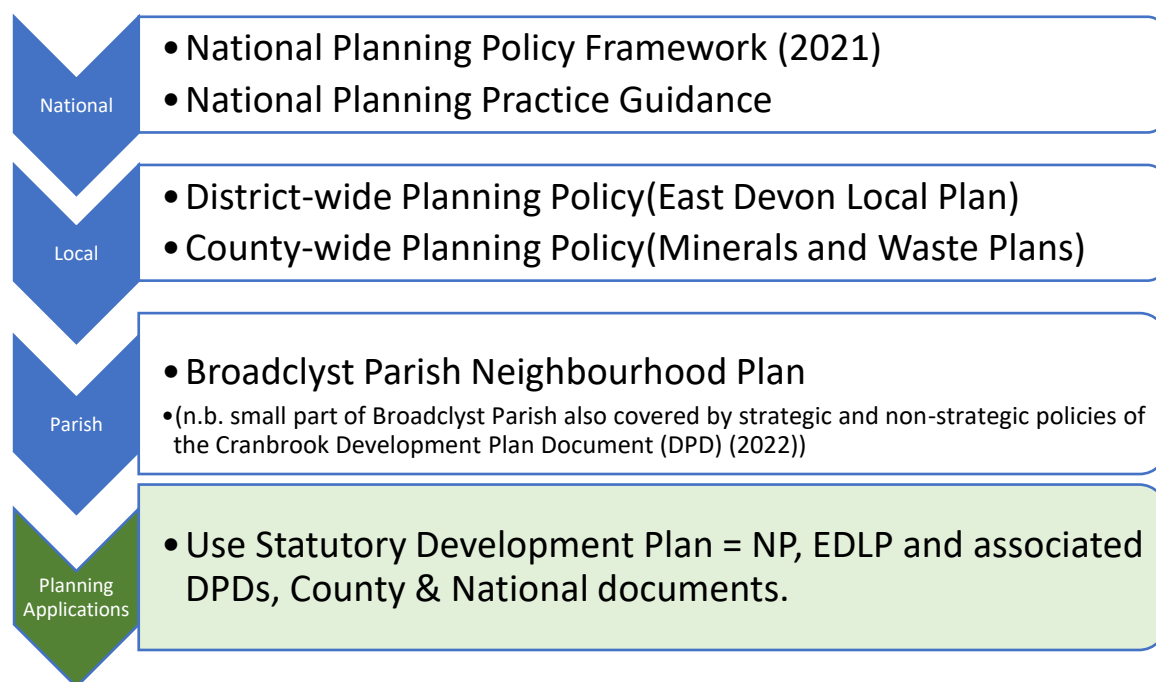


Figure 1: Planning Framework

What power will the Broadclyst Neighbourhood Plan have?

1. As seen in figure 1, the Broadclyst Parish NP will be part of a statutory development plan used to determine planning applications. East Devon District Council, the local planning authority, will have a

¹ NPPF (2021) <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² NPPG (revised 2019) <https://www.gov.uk/government/collections/revised-national-planning-policy-framework>

³ DCC (2017) <https://www.devon.gov.uk/planning/planning-policies/minerals-and-waste-policy/devon-waste-plan>

⁴ East Devon Local Plan (2016) <https://eastdevon.gov.uk/planning/planning-policy/local-plan-2013-2031/>

legal obligation to use the Broadclyst Parish NP when making decisions on planning applications in the Parish; it is a powerful tool with statutory weight.

2. Policies in a NP operate in tandem with the Local Plan, but if documents refer to the same specific matter, the newest document will hold greater weight in the decision-making process. This remains in place until the NP is superseded by a new local plan and / or by national frameworks and guidance. In some cases, the NP policies may reference similar outcomes as other policies at national and local level, but will also be adding a local dimension or further detail to those strategic policies. This local perspective remains a valuable template and will remain holding value in the decision-making process if a newer plan is in place.

A Neighbourhood Plan

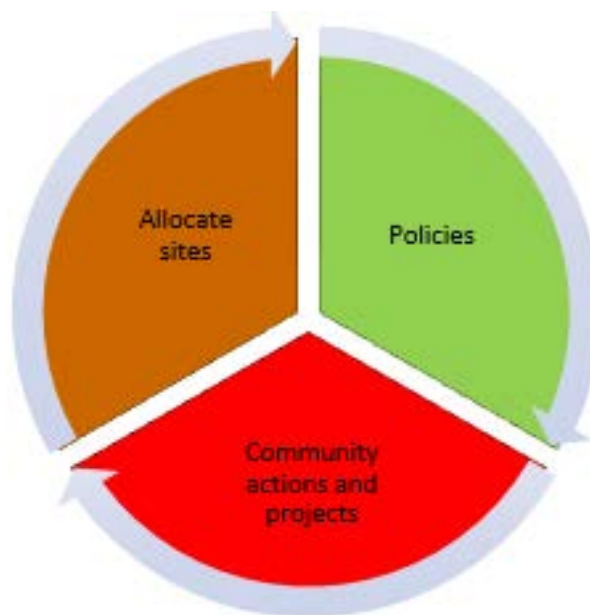


Figure 2: Neighbourhood Plan content model

The NP has three sections as seen in Figure 2: it allocates sites, it contains policies, and it identifies community aspirations, actions and projects. Through site allocation and policies, it can protect, preserve, meet identified local needs, and take the parish forward in line with how local people feel it should evolve. Identifying gaps in current provision provides a diverse range of aspirations, community actions and projects which will enhance what the parish contains and offers its residents.

What if there is not a Neighbourhood Plan?

1. It is not compulsory to write a Plan, allocate sites, draw-up policies or try to fill gaps in current provision - indeed many towns and parishes do not - but without a Plan we have no power to decide what happens to Broadclyst Parish in the future, with the little influence we do have as a planning consultee often not holding enough weight. If a site is in the Plan, the community has control over what it is, how it looks, and what it offers. If a site is not in the Plan, it can still be developed but with little influence from the community. As Nicholas Boles MP Feb 2013 stated,

“No for a neighbourhood plan does not mean a no vote for development, but for no control over development.”

2. In summary, without a NP the Parish will remain vulnerable to development. Planning applications will only be looked at from a National and Local Plan perspective meaning the granular detail of local aspiration will be lost in the wider objectives of the East Devon Local Plan. Local people see the NP as a conduit through which community aspirations and need are delivered.

Why is Broadclyst Parish Council writing a Neighbourhood Plan?

1. Broadclyst Parish is part of the EDDC Strategic Development Plan, with the parish council and community having no legislative power to stop or negotiate development other than by responding to planning applications as a consultee. This is frustrating, especially when concerns we have raised at planning stage have been overlooked, only for them to subsequently be recognised and altered⁵ at a later stage.

2. The NP changes the community's position from reactive to proactive, creating a Plan for the parish; a clear mandate from the community; a proactive way to move forward. Without a Plan, development is determined in accordance with National and Local Planning policies, which are unlikely to be detailed enough to address local need in individual parishes.

The Community's Plan

Unlike National and District Planning frameworks, it is "community-led", which puts the community in the driving seat when it comes to having a say over what, how and where development should take place. This NP is the community's plan for Broadclyst Parish. It represents the community's vision and priorities for how they would like to see the local area change in the coming years. In doing so, it sets out the local planning policies and community actions that will be considered when proposals for development and projects come forward in the parish. The Consultation Document (Appendix 7) provides the contributions of the community and community groups in chronological order in the development and production of the NP. The NP is evidenced-based, being chosen and approved by local people and is the channel to deliver the parish's vision. The Parish Council's Equalities Policy⁶ was adopted and available to all involved throughout the NP writing process, to ensure application of the Parish Council's vision and commitment to equality of access and opportunities.

East Devon District Council (EDDC)

1. The local planning authority is East Devon District Council, which provides a support system in place for Neighbourhood Plans. As well as a start-up grant for groups, there is a dedicated officer to support the NP process at both council and community level. EDDC prides itself on the number of NPs made (50% of Parishes) and those in the creation and submission processes.

2. There has been close communication with NP officers throughout the process, through one-to-one support, conferences, workshops, and regular newsletters. EDDC also provides a well-resourced website⁷ that includes guidance, templates and information.

3. EDDC as well as other statutory authorities were provided with the Regulation 14 NP Draft, and access to the Broadclyst appendices on the Parish Council website. The Consultation Statement

⁵ an example of which was the road widths at Hillside Gardens and the lack of off-road parking

⁶ <https://www.broadclyst.org/parish-council/governance/policies-and-procedures?start=10>

⁷ <https://eastdevon.gov.uk/planning/planning-policy/neighbourhood-and-community-plans/neighbourhood-plans/>

features EDDC Regulation 14 feedback, along with details on how the NP Overview Steering Group summarised and addressed the main issues raised. General conformity with the East Devon Local Plan (EDLP) (2013-31) was discussed and agreed.

Emerging New Local Plan 2021-2040 (Issues and Options published 2021)

1. EDDC had been working on a joint local plan with neighbouring Devon local authorities (the Greater Exeter Strategic Plan, GESP). However, the GESP itself is now not going ahead, although options are being exploring for a shorter joint informal plan.

2. EDDC is now preparing its own new Local Plan⁸. The emerging New East Devon Local Plan (NEDLP) is expected to take the shape of a single Local Plan to replace the existing EDLP (2013-31) and East Devon Villages Plan. EDDC published a Regulation 18 Issues and Options document in January 2021, and consultation ran from January to 15th March 2021.

3. In the EDDC Strategic Planning meeting, 22nd February, the Draft Plan was put into context.

“It is stressed at the outset that the working draft local plan is, by clear design, not a finished document that is ready for public consultation now; it is an initial working draft of options which it is for members to consider and indicate if they endorse the direction of policy development. The intent is, in accordance with previously agreed timetables, that the working draft plan will be refined over the coming weeks to form a proposed draft plan for public consultation.”

4. It was envisaged that a draft Plan will be submitted for examination by March 2023 and adopted by February 2024. However, there have been delays in the process.

5. The NEDLP itself expresses strong support for the production of NPs (paragraph 2.11). At the time of submission (14th December) there were no draft policies available but the resubmission for Regulation 16 in June 2022 has meant that there are some draft policies⁹ available. Several policies within the NP are aspirational and have been designed to comply with recent NPPF (2021) documentation that supersedes the policies in the EDDC (2013- 2031) Local Plan. This future proofing was to ensure that the policies within the Broadclyst NP would still be in general conformity with the emerging new East Devon Local Plan.

Implementation, Monitoring and Reviewing of the Broadclyst Neighbourhood Plan

After Referendum, the Broadclyst Parish NP must be delivered, implemented and able to be monitored over the Plan period (2021-2031). Broadclyst Parish Council’s involvement in the NP process will now transition from a Plan forming focus to Plan implementation and the delivery of community projects. In Chapter 7, the Broadclyst Neighbourhood Plan implementation, monitoring and reviewing strategy provides detailed information on the process for the NP. Appendix 1 is designed to support and guide the Parish Council in applying the policies and securing its objectives by providing templates, which include indicators for measuring the success of the NP. These will enable effective monitoring, ensuring the Plan and its projects are successful and highlighting any aspects that may benefit from reviewing and revising.

⁸ <https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/>

⁹ <https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/draft-local-plan/>

Pre submission of the Plan

After implementing amendments to the Regulation 14 Draft Plan from the feedback received by the Community and Statutory bodies, the following Locality support packages were undertaken:

1. **AECOM Evidence Based Policy Development (EBPD)** (Appendix 29). The aim of the EBPD is twofold: firstly, to review the existing evidence base, identify any gaps within it; and then present policy options and recommendations based on the existing evidence base and any additional relevant information / legislation that applies.
2. **Plan Health Check** (Appendix 30). The NP health check considered whether the Draft Plan meets the basic conditions and provided evidence on any potential amendments required to ensure the conditions are met prior to submission of the plan to the local authority.

These were undertaken to ensure that the NP Draft was checked and amended prior to submitting the NP to EDDC. These packages resulted in extensive changes to the Draft and the Appendices of the Plan. EDDC were sent the Draft Regulation 16 NP and were also involved in the Health Check process.

Submission of the Plan

The Broadclyst Parish NP was submitted to East Devon District Council (EDDC) on 14th December 2021, with the following supporting documents:

- Map of the Broadclyst Neighbourhood Plan Area.
- Consultation Document (Appendix 7).
- The Basic Condition Statement (Appendix 3).
- Strategic Environmental Assessment (SEA) (Appendix 5).
- Habitats Regulation Assessment (HRA) (Appendix 6).

Legal Compliance Assessment

On 3rd February 2022, EDDC provided a Draft Legal Compliance Assessment (Appendix 35) which resulted in the NP being delayed. Revision of the NP resulted in updates to and/or additional sections being added to the NP and appendices.

The Scoping Opinion on Viability Report (2022) technical package funded by Locality (Appendix 36) was completed to ensure that the Neighbourhood Plan is deliverable and that all allocated sites are evidenced as viable. Two sites requiring further technical work were withdrawn.

The following revised documents were resubmitted in June 2022.

- Broadclyst Parish NP
- Consultation Document (Appendix 7).
- The Basic Condition Statement (Appendix 3).
- Strategic Environmental Assessment (SEA) (Appendix 5).
- Habitats Regulation Assessment (HRA) (Appendix 6).

The Plan Area

In October 2013 EDDC designated part of the parish of Broadclyst as a Neighbourhood Plan Area. The agreed area was smaller than that originally proposed by the Parish Council as EDDC felt that the strategic planning areas should be excluded. A Community Governance Review resulted in the creation of a new Parish boundary, with a change in the Neighbourhood Planning Act 2017

legislation enabling changes to be made to the 2013 designated NP area. The designation of the whole Parish is minuted and agreed by Cabinet on 13th July 2017¹⁰ (agenda item 37) with the effective date of the decision being on 20th July 2017. The Plan area is seen in Figure 3.

¹⁰<https://democracy.eastdevon.gov.uk/CeListDocuments.aspx?Committeed=136&MeetingId=554&DF=13%2f07%2f2017&Ver=2>

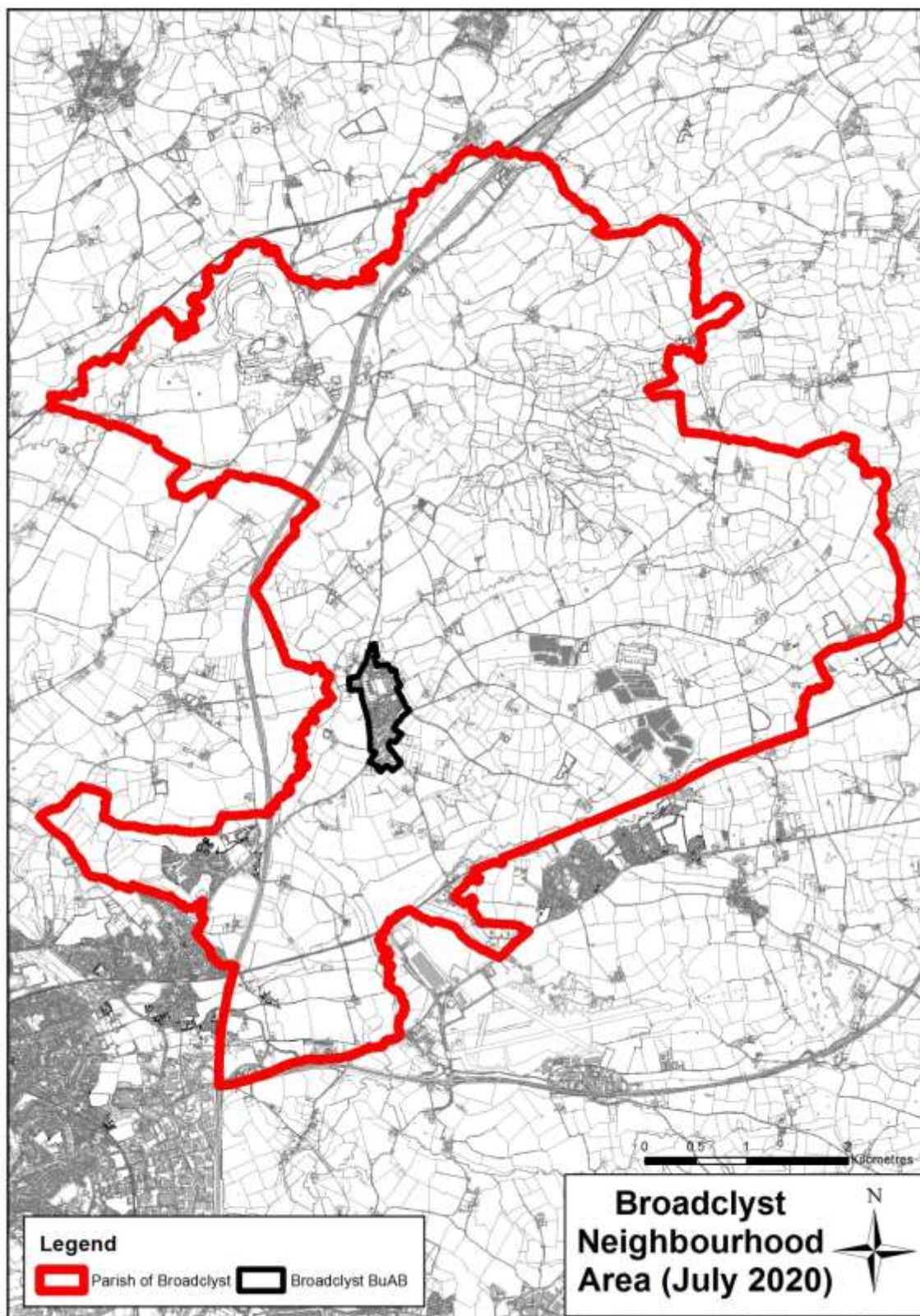


Figure 3: 2017 Designated NP Area showing Broadclyst Village BUAB

Our Evidence Base

The content of the Plan is informed by an evidence base, so that the policies and projects are underpinned by clear reasoning and justification. A team of hard-working volunteers on Steering Groups have collated and analysed existing provision to identify gaps to inform our Plan's vision,

aims, objectives and policies. This work was informed by two whole-parish surveys conducted in 2016 (Appendix 2) and 2017 (Appendix 8). Through these surveys, the community fed back about what they liked about the parish, what they wanted, what was important to them, and what housing they needed. A Call for Sites process concluded in 2017, and the next two years were devoted to engaging with landowners who had submitted sites to discover what they could offer the community, and how identified community needs could be met. This process is what makes a NP different from any other Development Plan, it is a bottom-up process, led and informed by the local community. The Consultation Document (Appendix 7) provides evidence of the involvement of the community, businesses, and landowners in the Plan process. Research and evidence material utilised for writing the chapter and the policies has been placed in Chapter Evidence Documents found in Appendices 9 – 12.

Allocation of Sites

A detailed site assessment process is provided in Appendix 19. This is one of the most important evidence base documents for the Plan. This document provides details on how each site progressed in the NP. Seven sites are allocated in the Reg 16 Plan, and include economic sites, housing sites, and a community sports hub site. Sites coming forward in the NP process were assessed by different agencies. The AECOM (a company commissioned by Locality to provide technical assessments for NP groups) site assessment is presented in Appendix 18. The Stratton and Creber assessment is presented in Appendix 21 and the Community Sports Hub assessments were carried out by the Local Planning Authority (Appendix 16 and 17). Some sites were put forward for multiple uses, such sites were therefore assessed for each submitted use. In Figure 4 a summary provides: the number of sites put forward for the NP, site assessment and the sites that progressed into the Reg 16 Draft. Two sites (EM1 and EM2) were withdrawn from the final Reg 16 submission document and are to be included in a future revised Broadclyst Neighbourhood Plan. A revised NP will be produced to compliment the emerging new East Devon Local Plan.

Sites at start of the process	Site Assessment	Reg 14 Sites going into the Reg 16 Submission Draft
Community Sports Hub. Three sites were put forward by landowners.	East Devon District Council ranked each site. All three went through to public consultation. (CSH B, CSH C and CSH W). A Heritage Impact Assessment, HIA, was completed on CSH B by EDDC. (Appendix 16) Feasibility study was completed on CSH C by EDDC. (Appendix 17)	CF1 (CSH C) to remain in the NP. A clause allowing an alternative suitable site to come forward was added.

Sites at start of the process	Site Assessment	Reg 14 Sites going into the Reg 16 Submission Draft
Economic Sites: Five sites were put forward by landowners. Three of these sites were also assessed as mixed development sites.	1.Stratton and Creber Commercial Marketability Assessment (Appendix 21). SC1 – SC5 2. AECOM Mixed development assessment of MU5, MU6, MU7 (Appendix 18)	EC1 (SC5) EC2 (SC1/MU6) EC3 (SC2) withdrawn on examination.
Mixed Development Sites Eight sites were put forward by landowners.	AECOM: Five sites (MU1-MU3 and MU7-MU8) were deemed suitable for mixed use with minor constraints. MU5 -MU6 with more constraints. MU2 withdrawn by owner. MU3 as unsuitable. (Appendix 18)	EM1 (MU5) and EM2 (MU8) withdrawn in light of the EDDC Draft Legal Compliance Assessment and the requirement of master planning and viability work.
Housing Sites Nine sites were put forward by landowners.	AECOM: H6, H8 and H9 were deemed suitable. H1 and H3 potential with constraints. H2, H4, H5 and H7 as unsuitable. (Appendix 18)	H1 (H3) H2 (H8) H3 (H6)

Figure 4: Sites put forward for the NP and those progressing to the Regulation 16 Draft

Sustainable Development

The National Planning Policy Framework (NPPF) 2021 and National Planning Practice Guidance (NPPG) 2018 set out the Government’s planning policy to which all plans and proposals for development must comply. The NPPF includes, at its heart, a “presumption in favour of sustainable development”. Planning policies and decisions considering local circumstances, character, needs and opportunities for the parish guide development towards sustainable goals. In the Basic Conditions Statement (Appendix 3) there are dedicated paragraphs providing a summary of how the NP delivers sustainable development.

Sustainability Appraisal

The Plan is subject to testing to help determine its positive or negative impact on the social, environmental, and economic character of the parish. This assessment process is presented in a draft Sustainability Appraisal (SA) in Appendix 4. The aim of the SA is to identify impacts and then propose possible amendments to policies, to lessen any potential negative impacts which could arise from the Plan’s policies and / or proposals. The Sustainability Appraisal will be completed in full after examination when final versions of the policies are available. The Basic Conditions Statement also provides further evidence of sustainability.

Clyst Valley Regional Park Masterplan¹¹

The Clyst Valley Regional Park (EDLP (2013-31 Strategy 10)) and the Clyst Valley Regional Park (CVRP) Masterplan, put out to consultation in 2020 and accepted in April 2021 (Appendix 33), are important documents due to the extent of the park within the Parish. The strategy objectives and CVRP Masterplan objectives and projects are included and justified within the NP policies and projects. In Appendix 25 the five allocated sites lying within or close to the CVRP are assessed in relation to each of the objectives in the CVRP masterplan. The sustainability appraisal provides details on social and environmental benefits of the policies which are also embedded into the CVRP Strategy and Masterplan documentation. A lot of projects within the NP share or build on projects listed in the Masterplan. There are also joint projects with CVRP listed in the NP. Therefore, the NP is in general conformity with CVRP, and development brought forward in the Broadclyst NP is in line with the principles set out in Strategy 10 of the EDLP (2013-31).

Basic Conditions Statement (BCS)

1. Our Basic Conditions Statement (Appendix 3) will demonstrate how our Plan contributes to the five basic conditions that are relevant to a neighbourhood plan. These are:

- Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the Neighbourhood Plan.
- The 'making' of the Neighbourhood Plan contributes to the achievement of sustainable development.
- The 'making' of the Neighbourhood Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- The 'making' of the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations.
- Prescribed conditions are met in relation to the Neighbourhood Plan and prescribed matters have been complied with in connection with the proposal for the Neighbourhood Plan.

2. The BCS provides tables which clearly provide details of how each policy in the NP links with and is in general conformity with both the NPPF (2021) and the EDLP (2013-2031).

The Structure of Our Plan

Our Plan is divided into two sections:

Section 1: labelled introduction, setting out the context of neighbourhood planning; introducing the parish; detailing the vision for the parish and the themed aims and objectives which respond to the key issues raised from extensive community research and consultation. Community projects and actions are identified under theme headings.

Section 2: labelled policies set out the planning policies under key headings. Before each policy, the following is provided:

- Introduction for why we need the policy.

¹¹<https://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/clyst-valley-regional-park-masterplan/>

- The other planning policies in national and district-wide planning documents which relate to that policy.
- How the policy links to and supports local evidence.
- Intent of the policy.
- The policy.
- Justification for policy.

It is important to note that, whilst this document has listed policies under chapter headings, when development proposals are being assessed, the whole Plan (i.e., all policies) should be considered as development covers several policy areas. For example, a mixed development site allocation may well link to Design policies, Natural Environment policies, Heritage policies and Housing policies.

Within each policy area a range of community actions and projects will be provided, which have been identified through local consultation and in the development of the Plan's Aims and Objectives.

Accessibility

The Broadclyst Neighbourhood Plan process spans from 2013 to 2022, and accessibility requirements came into place in September 2018. Therefore, the NP reference documents include both accessible and non-accessible material due to some predating the regulations. The submission documents are in line with the Broadclyst Parish Council Accessibility Statement.¹² The NP appendices and reference documents are produced in a variety of formats and by a variety of organisations. Documents produced and owned by third party organisations are covered under their own accessibility legislation. Combined PDF folders containing both third party and parish council text therefore fail a single document accessibility check.

A Snapshot of Broadclyst Parish

Location

Broadclyst Parish is located around 3km (1.5miles) to the northeast of Exeter City Centre as seen in Figure 5. The western boundary lies next to the Exeter City Council ward of Pinhoe while the south-eastern boundary abuts to Cranbrook Town Councils' boundary. There is coalescence between the Parish and Exeter, making it difficult to know where one boundary stops and the other starts. This coalescence has made parishioners aware of the need for green wedges being provide as new development adjacent to the parish boundary comes forward. In EDLP (2013-31) Strategy 8 it states that

"development will not be permitted if it would add to..... or damage the individual identity of a settlement or could lead to encourage settlement coalescence".

Although this refers to green wedges, it is hoped that this will be adhered to when Cranbrook western expansion zone (Bluehayes) gets built adjacent to Broadclyst Station.

¹² Broadclyst NP Accessibility Statement: <https://www.broadclyst.org/neighbourhood-plan/neighbourhood-plan-documents?folder=Regulation%2B16%2BDocuments>

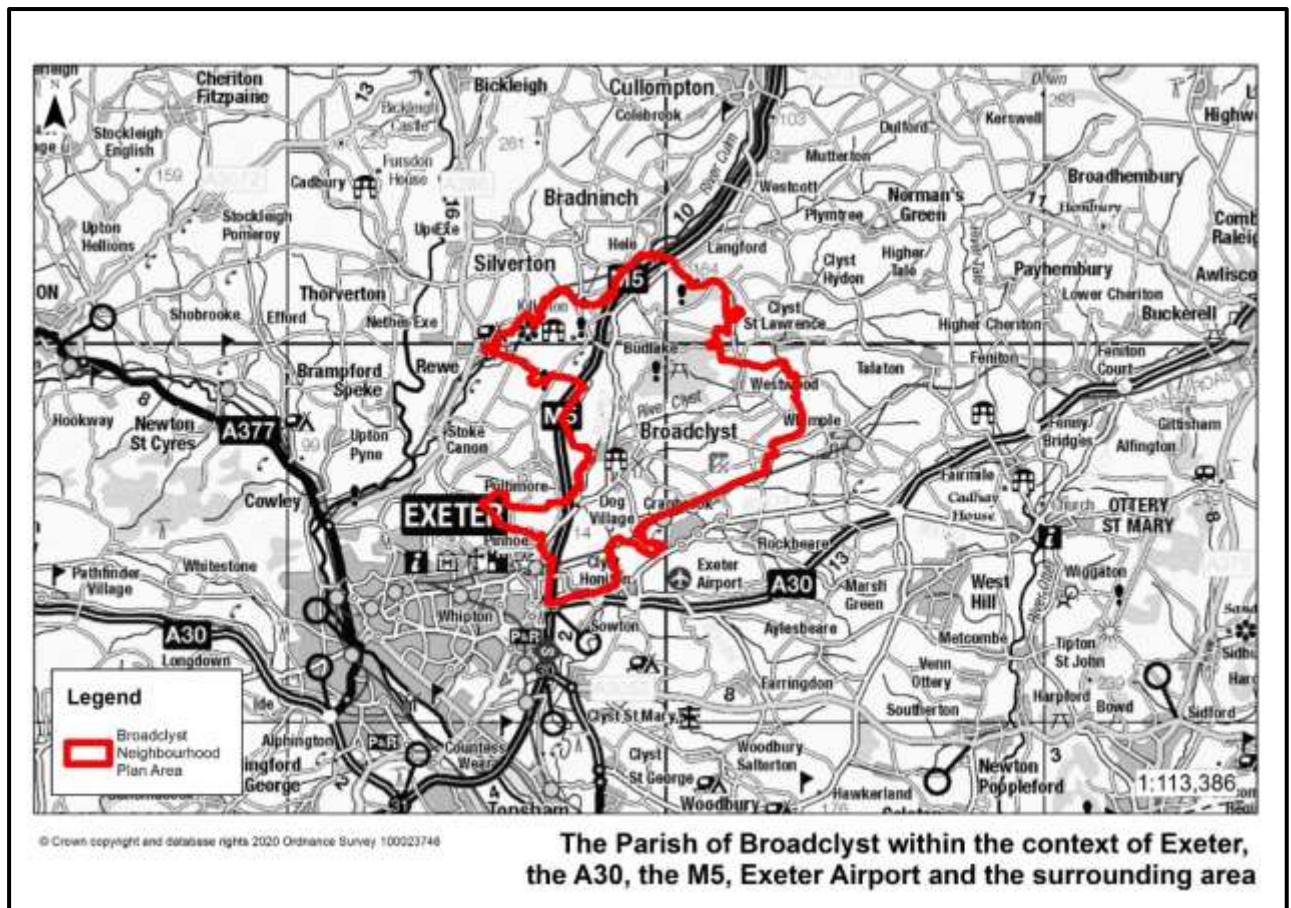


Figure 5: Broadclyst parish in context to major roads, Exeter Airport, and the town of Exeter

Parish Data

The total area of Broadclyst NP is 3,953.84 hectares and is the biggest parish in East Devon. The parish had a population of 2962 at the time of the 2011 Census. It is the biggest growing Parish in East Devon with the population estimated to have increased by two thirds before the next census.

History

It is its history and development that has shaped the parish we see today and given each settlement its special and distinctive character.

Earliest settlement dating from the prehistoric to the Romano-British period is indicated by cropmark enclosures, ring ditches and the Iron Age Hillfort at Killerton, a scheduled monument, (DCC Historic Environment reference: MDV1312, MDV52108, MDV52109, MDV52112, MDV52113, MDV54115).

Medieval development of Broadclyst is mentioned in the Domesday book 1086, and within the area are heritage assets that span the ages such as Parish Church of St John the Baptist which still retains 14th century material design (MDV10153), the remains of the vaulted undercroft (MDV10167, Scheduled Monument), the 15th century medieval cross located in the church yard (MDV10154, Scheduled Monument), Clyston Mill (MDV19788) and Old Windmill (MDV10152). Such assets provide a parish rich in historical character.

The National Trust

1. The Parish has an attractive rural setting and landscape character with much of the land (6400 acres) belonging to the Killerton Estate owned and run by the National Trust (NT).
2. The Estate consists of farmland and woodland dominating the area shown in Figure 6, a stark contrast to the areas of strategic residential and commercial development to the south-western edge of the Parish. In addition to the Georgian House and Park, the estate has approximately 250 residential properties, 18 farms and several orchards and extensive woodlands. The Killerton Estate houses are clearly identified throughout the Parish due to the recognizable vernacular of yellow limewash / cream and brown sepia in combination with red brick, tile and local sandstone as seen in the photographs below. The Killerton Estate by its size is a dominant force in the parish and sets the natural environmental landscape of the parish. As a lot of the land owned by the National Trust is declared inalienable:

“such land cannot be voluntarily sold, mortgaged or compulsory purchased against the Trust’s wishes without special parliamentary procedure. This special power means that protection by the Trust is forever¹³.”

This provides the community with the knowledge that a lot of the estate land within the Parish will be protected within the National Trusts values which are to:

“look after nature, beauty and history throughout England Wales and Northern Ireland for everyone for ever¹⁴”

3. Much land in the parish outside the National Trust ownership has been utilised for EDDC Strategic development, which makes the Killerton Estate an even more valued asset for those who live and work in the Parish.
4. The Killerton Estate has engaged throughout the NP process. The Vision and Concept of Killerton (Appendix 13) describes the plans for the estate set out by the National Trust whose charitable aims are to preserve and protect historic places and spaces forever, for everyone. Within this document are sites which have been allocated in the NP to enable the Killerton estate to continue to have a dominant role in the life of the Parish and its community.



Photographs of Killerton Estate properties showing the estate render vernacular

¹³ <https://www.nationaltrust.org.uk/features/information-to-journalists>

¹⁴ <https://www.nationaltrust.org.uk/features/for-everyone-for-ever-our-strategy-to-2025>

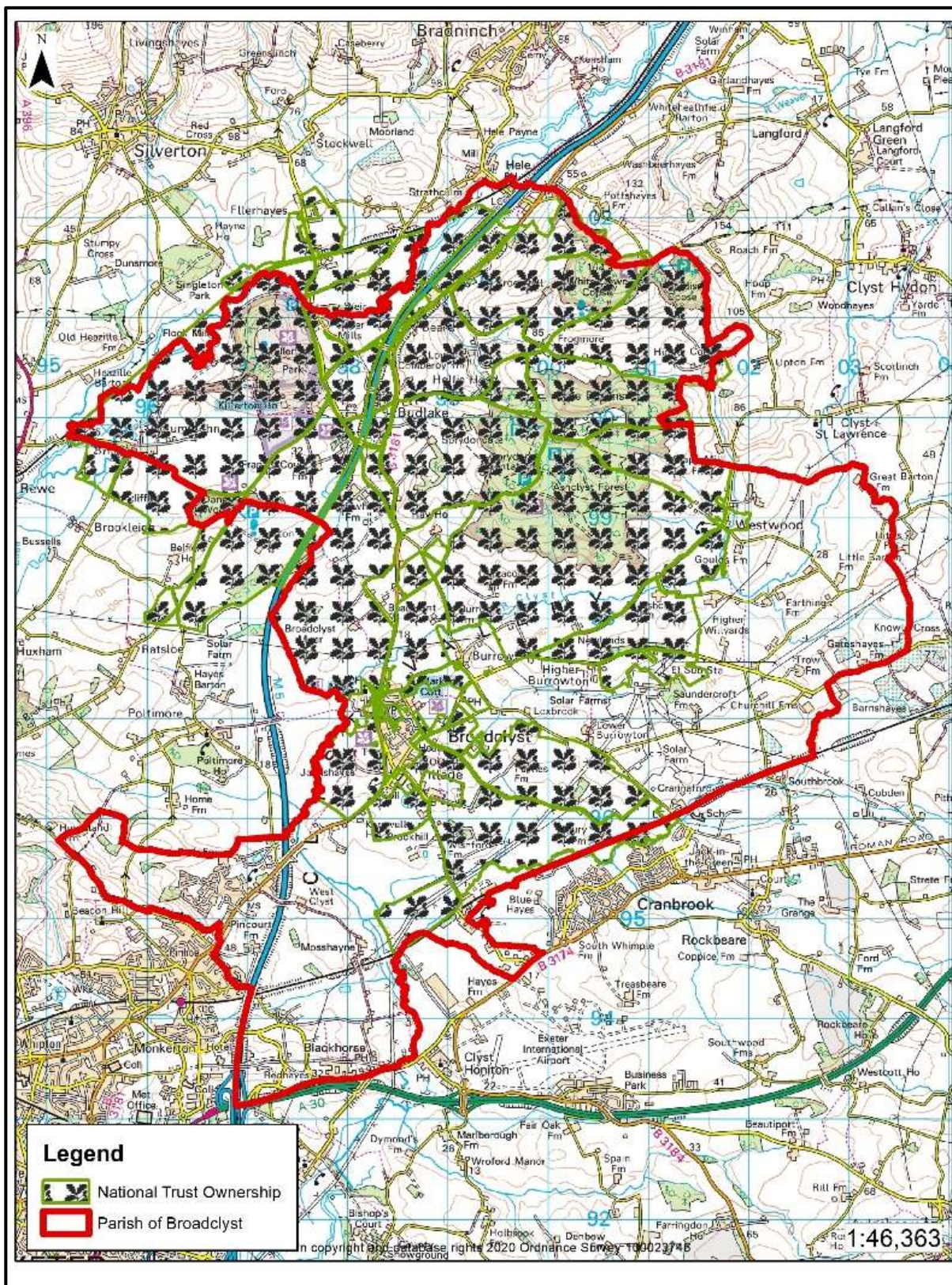


Figure 6: Parish map showing extent of land under National Trust ownership

Conservation Area

The Conservation Area (Figure 7) situated at the northern end of Broadclyst village, includes a number of listed and historic buildings. The village is quite unique to Devon in that much of the land, buildings etc. are under the National Trust (NT) ownership. Broadclyst village is one of the best-preserved examples of a large Devon estate village, with New Buildings being considered the finest of its vernacular in Devon. The yellow-coloured (ochre) buildings shown above are owned by the Killerton Estate and such a palette is a dominant feature throughout the Conservation Area.

Listed Buildings and Structures

The Devon County Historic Environment Record (HER) records that the plan area contains the following:

Designated Heritage Assets.

1 Grade I Listed Buildings.

17 Grade II Listed Buildings.

127 listed historical assets in the Conservation Area.

1 Scheduled Monument.

5 historical assets in the registered Historic Park/Garden.

The listed buildings and structures within the parish are presented in full in the Parish Design Code (Appendix 14). Many of these historical assets lie within the Killerton Estate that is managed by the National Trust. Being under this ownership provides an added layer of protection for these heritage assets.

Communities

Historically the main settlement in Broadclyst Parish was Broadclyst Village with smaller communities at Westclyst, Budlake and Beare along the B3181. In the rural area lie the communities of Columbjohn and Westwood. There are two further communities at Broadclyst Station and Blackhorse both of which are in the south of the parish lying close to the old A 30 road to London.

New Strategic Developments

Residential

1. New major strategic development at East Devon's West End (Strategy 9, and 13 EDLP (2013-31) have, and will continue, to dramatically change the natural environment of this area of the parish. These developments bring forward new centers of population and commercial enterprise.

2. Residential developments (projected number of 4050 new houses) at Westclyst, and Tithebarn will result in a large population influx (See Figure 8). Historically the main settlement and largest population was in Broadclyst Village, however both Westclyst (pictured) and Tithebarn will be the largest communities in Broadclyst Parish.



Commercial

Development of the Exeter Science Park (Strategy 9 EDLP (2013-31)) coloured in Orange (027) in Figure 8 brings forward a new research and technology employment site. Just beyond the parish boundary are further economic developments of Exeter Gateway, Skypark, Hayes Farm Logistics Park and Exeter Airport and its Business Park.

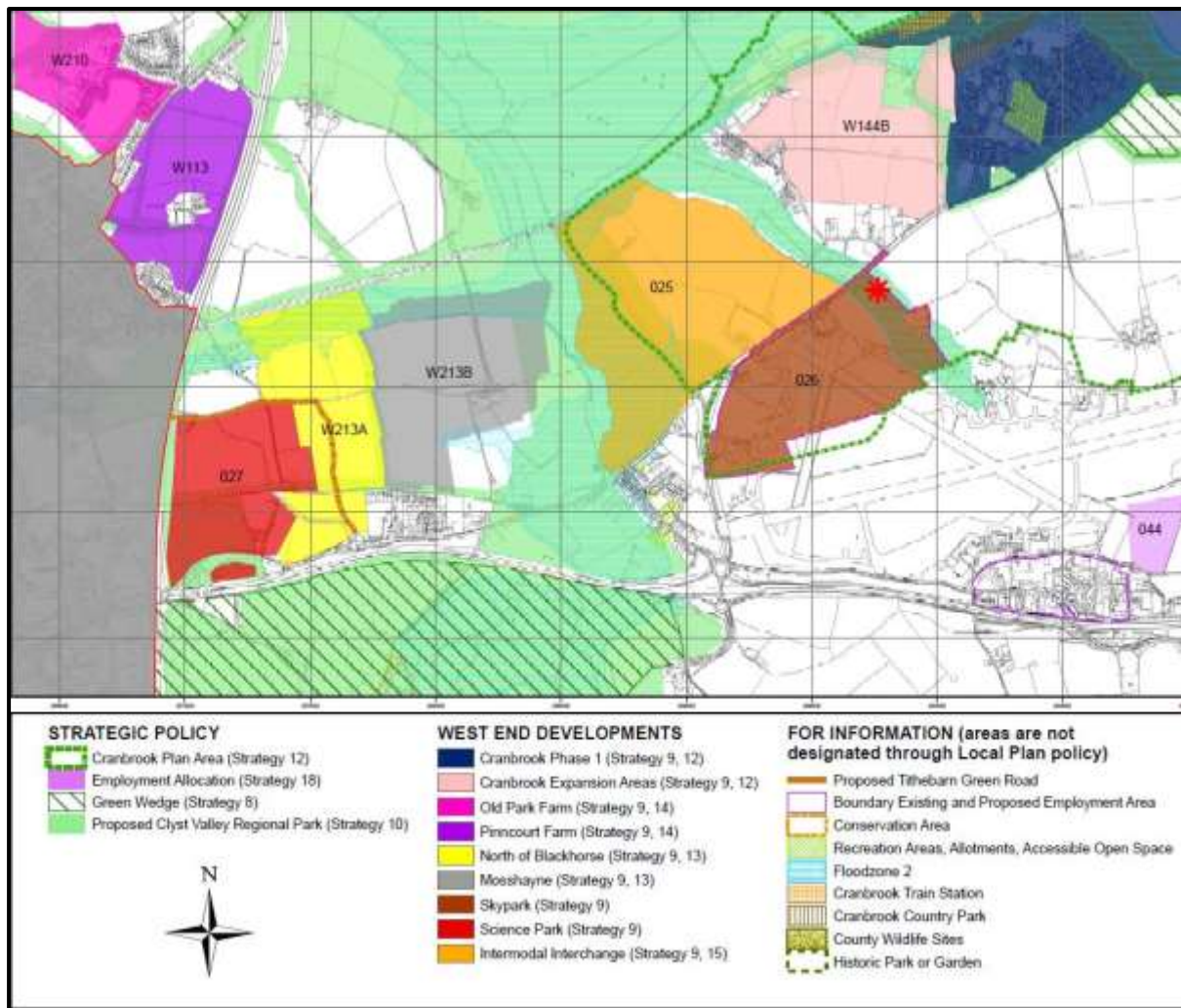


Figure 8: Extract from EDDC EDLP (2013-31) West End Insert Map showing Broadclyst Parish sites 027, W210 213 & 113.¹⁵

Rivers and Flood Land

The three rivers of the Cranny, Clyst, and Culm provide broad floodplains within the parish and dominate the landscape to the north and west of the parish. Flooding of these rivers is an unfortunate part of parish life with road infrastructure being most affected (Figure 9). The expanse of the river networks in the parish has positive aspects for flood storage on floodplains and the scope for greater absorption of water and carbon, as well as the creation of new wildlife habitats. Preserving and enhancing the functionality of the floodplain areas, considering the significant role they have in water storage during flood events, is important for the parish. Altering land use from intensive farming to working with nature will also enable such changes to take place.

¹⁵ EDDC West End Insert Map: <https://eastdevon.gov.uk/planning/planning-policy/preparation-of-local-plan/submitted-documents/core-document-library/proposals-map-and-inset-maps/>



Figure 9: Flooding in the parish

Character Landscape

The Parish lies within the Clyst Lowlands Farmlands landscape character area. The distinctive characteristics which define this landscape character area are:

- Lowland, undulating farmed landscape.
- Landscape crossed by streams and meandering watercourses.
- Mixture of small to medium scale fields often with curving boundaries reflecting medieval origin.
- Mixed farmland including arable and some pasture along water courses where there is seasonal flooding.
- Nature conservation interest provided by unimproved neutral grassland and marshy grass, particularly fringing streams.
- Dispersed pattern of small villages, dispersed farmsteads.
- Views to surrounding ridges of higher land.

Mixed farming is the predominant land use with vegetable production and cider orchards adding to the diversity.



Historic Landscape Characterisation (HLC)¹⁶ gives more detail on the character of the landscape and how the pattern of small farms, fields and hedgerows has developed since the medieval period, showing how the parish landscape has evolved in time.

Woodland

There are large swathes of woodland in the parish, with most views to the north being skyline views of Killerton Clump, Ashclyst Forest, White Down Copse and Paradise Copse. Away from the flood plains, trees and hedgerow trees are a dominant feature. There are also orchards, which in the past were a dominant land use.

Access and Infrastructure

1. The B3181 road is the principal access road in the parish and runs between Exeter and Cullompton. This road lies in the western portion of the parish linking the settlements of Westclyst and Broadclyst Village. 23 miles of unclassified roads to the west and east form a network of country lanes extending into the wider countryside and other communities. Many of these roads are single track with pull-ins. The infrastructure network servicing a historically rural agricultural parish is struggling to cope with the new parish developments, the expansion of Exeter and the new Town of Cranbrook.

2. The Exeter to Waterloo Railway runs through the parish but no stations are located within the parish, although Cranbrook and Pinhoe stations are just outside the parish, there are derelict station platforms at Broadclyst Station. A public bus service runs at twenty-minute intervals at peak times along the B3181, offering links to nearby towns of Exeter, Cullompton, and Tiverton. Services are less frequent outside peak times, in the evenings and at weekends. There is no north-south bus connections across the Parish notably between Broadclyst village and Cranbrook. Bus links to Cranbrook and Honiton are provided along the (B3174), serving the southern side of the parish, including the Exeter Science Park, Tithebarn and Blackhorse.

3. Exeter Airport lies just outside the parish boundary. Cycle links to the airport from Blackhorse and Broadclyst Station are good, while direct public transport links do not exist at present, except by using Exeter Town Centre provision.

Footpaths

There are 24 public footpaths within the Parish that offer over 18km spread over 8 routes, most of which run north / south. The footpaths do not offer circular routes, and several do not have a definitive destination. There are no bridleways marked on the rights of way OS map, but the Killerton Estate have provided permissive bridleways within the Estate and its woodlands.

Cycle Paths

There are shared cycle paths within the parish, with more being provided due to new strategic housing development (EDLP(2013-31 Strategy 9, 13)) and the Clyst Valley Regional Park (EDLP(2013-31 Strategy 10)) enabling people to cycle to Exeter, Exeter Science Park, Skypark, Cranbrook Train Station, Exeter Airport, Sowton Industrial Estate and to the wider cycle path network. In 2012 the Broadclyst to Killerton Cycle path opened and extending this path could offer further networks

¹⁶<https://www.devon.gov.uk/historicenvironment/the-devon-historic-environment-record/historic-landscape-characterisation/>,

across the Parish. There is a substandard quality cycle path along the main B3181 linking Dog Village with Westclyst. Given the growth of Westclyst and movement of pupils to/from Clyst Vale Community College, an upgrade or replacement of this route has been included as a community project.

Economy

Broadclyst Parish was a thriving rural parish with businesses located (Figure 10) across the parish as well as along the B3181. Over time its economic base has moved away from agriculture to the parish being a commuter zone for people working in Exeter. However, many places to work and businesses within the Parish have disappeared. There are three small business estates: Hungry Fox, Lodge Trading Estate and Beare Trading Estate providing offices, light industrial businesses and some warehouse and distribution use. There is the new Exeter Science Park within proximity to junction 29 of the M5 and the A 30. The parish also includes a number of isolated sole trader premises across the parish.



Figure 10: Beare Trading Estate and the Exeter Science Park

Our Vision

The Vision for this Plan was created, shared, and discussed through community consultations as set out in Appendix 7. The first part of the vision contains the key characteristics of the parish which the local's thought was important to include to give readers context of the parish. The parish is rapidly evolving and the vision for the parish reflects this. The vision also confirms community support for the parish to meet future needs, as well as protecting and enhancing the distinctive rural character landscape setting. The vision also recognises both national and global pressure on the parish, in particular the need to address climate change in local developments. The NP is structured around this vision for the parish until 2031.

Broadclyst Parish

Broadclyst is a rural parish, largely owned by the National Trust. The parish land which borders Exeter City has extensive, high density, new strategic development, which will double the number of houses within the parish. The rest of the land is rolling green countryside with wooded hills and broad floodplains.

It has a strong sense of community and is a friendly, safe and desirable place to live and to visit. Traffic and transport infrastructure is a widespread problem, as most people travel to work outside the parish. There are a small number of business units within the parish.

Broadclyst Neighbourhood Plan's Vision Statement

Our vision is for the parish to continue to develop and thrive, meeting the changing and diverse needs of our rapidly growing community and its responsibility to tackle national and global issues including climate change, whilst preserving and enhancing our distinctive character and landscape.

Our Aims and Objectives

1. The aims of the Plan were created, shared and discussed through community consultations as set out in Appendix 7. The themed Steering Groups drafted the aims using data from surveys and consultations as well as specific research and evidence collated. The aims are statements of intent while the objectives are specific statements that define how the Plan was to achieve the aims.
2. In the following section, the tables show the aims, objectives, and policies and where relevant the community Actions and projects. The tables are presented alphabetically.
3. Each aim is broken down into one or more objectives which are evidenced in the policies of the Plan.
4. Community actions and projects are provided for each chapter. These are presented in the blue boxes. These projects or actions require members of the local community, Broadclyst Parish Council, landowners, community groups and statutory authorities to work to achieve the outcomes. Both are an integral part of the development strategy for Broadclyst Parish and are likely to be significant in contributing to the needs and wishes of the community.
5. Seven of the projects are Community Infrastructure Levy (CIL) projects, these projects have been evidenced and agreed at Regulation 14 by the community to be funded/ part funded by utilising CIL revenues. 12 other projects can call upon CIL funding, but the resourcing of these projects is a decision for the Parish Council. These projects endorse localities wide range criteria set out in the

Community Infrastructure Levy: Neighbourhood Planning Toolkit (2017)¹⁷. It is to be noted that the term CIL is likely to be superseded, and that these projects are to continue to be funded through any such replacement scheme.

COMMUNITY FACILITIES

Aims:

- To provide a new Community Sports Hub.
- To maintain and improve existing community facilities.
- To provide additional community spaces for Sports, Leisure, and Recreation

Objectives:	Policy Code
<i>To protect and enhance existing community spaces, core current facilities and assets.</i>	CF2
<i>To provide new Community Sports Hub.</i>	CF1
<i>To provide a new all-weather floodlit pitch.</i>	CF1
<i>To assist disabled people to access sports locally.</i>	CF1-2
<i>To increase the range of outdoor and indoor sports for the community.</i>	CF1-2

Policy based projects that will be able to use Community Infrastructure Levy Funding
Policy CIL Project 1: Community Infrastructure money to go towards the provision of a Community Sport Hub Facility. Policy CF1

¹⁷ <https://neighbourhoodplanning.org/toolkits-and-guidance/understanding-community-infrastructure-levy-cil/>

DESIGN

Aims:

- To secure high quality development which addresses the challenges of climate change.
- To successfully integrate the built and natural environment.
- To protect historic structures, landscapes and buildings which determine the heritage character of settlements, communities and landscapes within the parish.

Objectives:	Policy
<i>To protect our heritage assets and historic landscapes in the parish.</i>	DH1
<i>To protect the historic character of Broadclyst Village and the Conservation Area.</i>	DH1-2
<i>To encourage regeneration of historical / heritage sites so that key features are saved.</i>	DH3
<i>To provide design guidance for Broadclyst Village and the small rural communities to protect autonomy and identity.</i>	D1
<i>To ensure that design of development addresses the challenges of climate emergency.</i>	DC1-6
<i>To support development of Passivhaus Houses and energy efficient new builds.</i>	DC1
<i>To provide design frameworks to influence planning and design of new developments.</i>	D1
<i>To protect and enhance the rural character landscape of the parish.</i>	D1
<i>To provide guidelines on the development of energy efficient buildings.</i>	DC1
<i>To support refurbishment and extension of existing buildings to be more energy efficient.</i>	DC2
<i>To provide design guidance on sustainable drainage.</i>	DC3
<i>To support development of surface water management for existing buildings.</i>	DC3
<i>To provide guidance and support for development of effective outdoor residential storage to support sustainable travel options.</i>	DC4
<i>To ensure development does not have an adverse impact on the natural environment or mitigation is provided if impact is unavoidable.</i>	D1
<i>To support provision of renewable energy generation on new and existing buildings.</i>	DC1-2
<i>To support community led renewable energy production.</i>	DC6
<i>To support district heating schemes which meet set technical conditions.</i>	DC5

Identified Community Action / Projects

1. To review the Parish heritage assets and to apply for non-listed assets to be placed onto the EDDC Local Heritage List.
2. To monitor and review the Conservation Area and to consider the extension of this area.
3. To re-establish old, protect and create new heritage trails across the parish.

Policy based projects that will be able to use Community Infrastructure Levy Funding

Policy CIL Project 2: Community Infrastructure money to go towards the historic regeneration and /or restoration of specific sites listed in Policy DH3.

Policy CIL Project 3: Community Infrastructure money to go towards the provision of Community Led Energy Generation Projects as seen in DC6.

ECONOMY AND EMPLOYMENT**Aims:**

- To expand and diversify economic development and activity within the parish.
- To regenerate brownfield sites within the parish.

Objectives:	Policy
<i>To provide new businesses in suitable locations to extend local employment opportunities.</i>	EC1 – EC2
<i>To support development of new buildings to provide diversification of existing farm businesses.</i>	EC1 -EC2
<i>To develop new micro-sized businesses throughout the parish.</i>	EC1, EC2, EW1
<i>To develop shared working space in the parish.</i>	EW1
<i>To develop start-up business which supports local opportunities or meets local needs.</i>	EC1 – EC2
<i>To expand development of tourism-based businesses.</i>	ET1 – ET3
<i>To support food and drink production businesses which link to the parish farming heritage.</i>	EC1

Policy based projects that will be able to use Community Infrastructure Levy Funding

Policy CIL Project 4: Community Infrastructure Levy money to go towards the provision of infrastructure to enable Elbury Lane between the Elbury Farm site and Heath crossroads to be downgraded as a quiet lane for pedestrian and cycle and access use only. Potential for joint project work with CVRP.

HOUSING

Aims:

- To provide housing to meet local needs.
- To increase accessibility and affordability of housing for local people.
- To increase provision of self-build and live-work units.
- To support housing that provides an identified community infrastructure need.
- To ensure new houses are in line with the NP design policies.

Objectives:	Policy
<i>To ensure there is a supply of affordable houses in perpetuity for local people.</i>	H2-3
<i>To support schemes and developments which provide a specific housing mix.</i>	H1-3
<i>To provide guidelines for houses to be built on sites not allocated in the Broadclyst Neighbourhood Plan.</i>	H5, D1, T3, T4, NE1-7
<i>To provide new residential and mixed development sites in the parish.</i>	H1-3,
<i>To provide a local connection housing criterion.</i>	H4
<i>To provide houses to meet local housing needs.</i>	H1-5
<i>To develop the provision of self-build properties in the parish.</i>	H1, H2, H6
<i>To develop the provision of live-work units in the parish.</i>	H7
<i>To provide identified community infrastructure need.</i>	H1 – H3,
<i>To ensure houses are designed to address the design policies in the Broadclyst Parish NP.</i>	D1, DH1 -4, DC1-6, H1- 8, T3, T4, NE1 - 7

Policy based projects that will be able to use Community Infrastructure Levy Funding

Policy CIL Project 5: Community Infrastructure Levy money from **H3** to go towards the funding of a 20mph Traffic Reduction Order (TRO) on Whimple Road in close proximity to site H3.

INFRASTRUCTURE AND ACCESS

Aims:

- To enhance the movement of people and traffic in and across the parish.
- To increase infrastructure and provision of and for sustainable modes of travel.

Objectives:	Policy
<i>To support the development of a bridge over the Waterloo Line for cyclists and pedestrians,</i>	T2
<i>To support the provision of a pedestrian and cyclist route from Broadclyst Station to Dog Village.</i>	T1
<i>To support developments which combine car park provision with sustainable energy generation.</i>	T3
<i>To ensure parking facilities provide charging facilities for e-bikes, scooters and electric vehicles.</i>	T3
<i>To develop a parish wide infrastructure for e- bike hire and car sharing schemes.</i>	T5
<i>To ensure provision of electric charging facilities for all new builds.</i>	T3
<i>To enhance and extend existing networks and create new footpaths, cycle paths, multi paths and low traffic neighbourhoods.</i>	T4, H5
<i>To provide cycle/footpaths to the Killerton Estate centres and a cycle network to link the centres together.</i>	T4,
<i>To support and expand a sustainable electric transport network across the parish, to include associated businesses, parking and recharging facilities.</i>	T4-5
<i>To provide signage to facilitate access to active travel.</i>	T5

Identified Community Action / Projects

4. To review and monitor improvements to maximise rail and bus services for the Broadclyst Parish community.
5. To monitor the provision of traffic calming schemes to increase pedestrian safety and reduce traffic speed at locations across the parish.
6. To provide traffic calming infrastructure at Blackhorse, Broadclyst Village and those identified in the PC Travel Plan.
7. To monitor the provision of pedestrian crossing points across the parish.
8. To provide pedestrian crossing points at the following locations: Budlake, Broadclyst Village and near Moonhill Copse/ Poltimore Gate.

Policy based projects that will be able to use Community Infrastructure Levy Funding:

Policy CIL Project 6: Community Infrastructure Levy money to go towards the funding of new active travel routes in Policies **T1, T2, and T4**. These active travel routes could be joint working projects with the CVRP.

NATURAL ENVIRONMENT

Aims:

- To protect and enhance the natural environment and diverse habitats of the parish.
- To protect and enhance the landscape setting of the parish.
- To ensure development provides a net biodiversity gain.

Objectives:	Policy
<i>To protect existing habitat areas and protect and enhance biodiversity.</i>	NE5
<i>To provide a tree replacement scheme to enhance tree cover in the parish.</i>	NE3
<i>To protect woodlands and significant trees.</i>	NE1
<i>To improve natural flood management of rivers to reduce impact of flooding throughout the parish.</i>	NE7
<i>To provide support for the development of flood defence schemes.</i>	NE7
<i>To protect and enhance hedgerows.</i>	NE4
<i>To allocate an orchard as a local green community space.</i>	NE6
<i>To protect, enhance and allocate local green spaces that have community access.</i>	NE6
<i>To allocate and protect wildlife corridors and green corridors.</i>	NE2, NE5

Identified Community Actions/ Projects

9. Community Planting Schemes for:
 - New orchard trees for the regeneration and extension of orchards in the parish.
 - Natural flood management.
10. Enhancing the accessibility, biodiversity, and community and/or educational value (including seating) Chapel Orchard in Dog Village (Broadclyst Village).
11. Identifying and safeguarding further areas of land for wildlife, landscape, amenity, and climate change mitigation/adaption outside Broadclyst Village as future local green spaces for the community to use and have access to. Local green space is specifically sought close to the following communities of:
 - Blackhorse
 - Broadclyst Station
 - Tithebarn
 - Westclyst
1. To monitor and review the Conservation Area and to consider the extension of this area.

Policy based projects that will be able to use Community Infrastructure Levy Funding

Policy CIL Project 7. Community Infrastructure Levy money to go towards the funding of planting schemes specified in policies NE2, NE3, NE4 and NE7.

Neighbourhood Plan Policy Chapters

1. Community Facilities and Services

Introduction and Justification for Policies

1. Community facilities are the bedrock that allows a community to meet, share, and work alongside others and experience a whole range of new activities. There are a range of community facilities including churches, village halls, public houses, parks, playgrounds, sporting facilities, public toilets and allotments.

2. They provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community. They play an important role in the development of vibrant neighbourhoods by creating a sense of place and providing opportunities for people to meet and interact socially.

Community Assets

1. Thousands of buildings and spaces across the country are in community ownership, including sports facilities, shops, cafes, cinemas, housing, car parks, community centres, nurseries, and wind turbines. Such buildings or infrastructure are community assets. Community assets, when delivered well and are properly supported, have multiple benefits such as:

A vibrant local economy: community-owned buildings can support a thriving network of local enterprises, by providing low rents to tenant organisations and can lead to training and job opportunities for local people. This is particularly powerful in areas of multiple disadvantage that have experienced withdrawal of private sector investment. For example, analysis of 10 community organisations found they had collectively enabled approximately 1,400 jobs and contributed £120m of gross value added to the local economy through their tenant organisations (Locality, 2017).¹⁸

Protection of local spaces: community asset transfer can protect cherished local assets that might otherwise fall into disrepair. These places can be a key source of civic pride, embodying the power of local activism and civic engagement. Community owners are also often able to access external funding to develop assets which public owners would not be able to, such as from foundation trusts, leveraging new resources into the local area.

Maintaining local services and maximising social value: transferring an asset with an associated service, for example a library or leisure service, to community ownership in order to protect the service from closure can be a key motivation for councils.

Strong and sustainable community organisations: community ownership can help support a sustainable and thriving local civil society by providing a physical base for local services and community activities.

Effective local partnership with citizens, communities, and the public sector: community asset ownership can strengthen the relationship and support a common vision between the community and the public sector.

Bringing places together: community-owned spaces are the heart of community, where local people come together, access vital services and amenities, and support each other. They provide a basis for

¹⁸ Locality 2017 Powerful Communities Strong Economies. <https://locality.org.uk/about/key-publications/powerful-communities-strong-economies-report/#>

community networks, attachment and belonging, and can support the community to address local challenges, leverage volunteer capacity and encourage local creativity.

2. The following list includes some of the Parish Council owned/ funded assets and amenities:

- Broadclyst Sports Pavilions Building and Car Park.
- Broadclyst Village Recreation Ground (bowling green, tennis courts, play area, teen zone, football pitch).
- Broadclyst and Westclyst Allotments.
- BMX track.
- Community infrastructure (i.e., seating, cycle racks).
- Dog waste and general refuse bins.
- Westclyst 9 v 9 football pitch.
- Westclyst Swale.

3. Below are listed some of the Broadclyst Parish Community Clubs and Associations:

Allotment Association	Bowling Club	Brownies and Guides
Cricket Club	Cycle Group	Tennis Club
Youth Football	Senior Football	Youth Club
Gardening Club	Theatre Group	Restoration Society
Women's Institute	History Society	Toddler Group
Scouts, Cubs and Beavers	Twinning Association	Heathfield Farm

Community Providers

1. Not all community facilities are run as community assets. Within the parish there are other providers, who provide key services to residents. Figure 11 illustrates the variety of community facility providers across the parish. Not listed are various management companies which provide public open spaces at Westclyst and Tithebarn, as these spaces are provided in order to bring the houses forward.

Name of organisation	Provision
Clyst Caring: Local charity	Provides a number of support services and social gatherings for people residing in the local community who are elderly, infirm, disabled, or isolated. Also runs a charity shop.
Sports and Social Club: Broadclyst Village	Social meeting place offering skittles, darts, and live music.
Victory Hall: Broadclyst Village	Holds a range of activities: music, exercise, societies, clubs.
The Killerton Estate (National Trust)	Offers running, park runs, riding, walking. Organised activities and events run by NT.
Public Houses	Meeting place offering food and drink.
Broadclyst Rifle club	Provides a shooting club.
Scouts building Westclyst & Scouts Camp site Caddihoe (Ashclyst Forest)	Provides beavers, cubs, and scouts.
Broadview Community Centre (EDDC) Broadclyst Village	Community centre provision and meeting rooms.

Name of organisation	Provision
Leisure East Devon (LED) Leisure Centre Broadclyst Village (on Clyst Vale Community College campus)	Provides evening and holiday sports provision. One indoor space.
Broadclyst Cricket Club and Club House Killerton	Provides a cricket club.
Places of worship	Services and community events.
GP Surgery and dispensary in Broadclyst Village	Provides NHS services.
Clyst Vale Community College	Provides a dual-use library
Heathfield Farm (Devon Link Up: A partnership project) Appendix 32.	Provides training and employment opportunities primarily, but not exclusively, for people with learning disabilities and/or autism.

Figure 11: The range of community providers in Broadclyst Parish

Legislative background

National

1. Much national and local guidance emphasise the value of community facilities. The National Planning Policy Framework (NPPF 2021) is centred on achieving sustainable development, which includes three overarching yet interdependent objectives. The social objective supports strong, vibrant, healthy communities by providing: a range of houses to meet present and future needs; well-designed safely built environments; safe places and;

“accessible services and open spaces that reflect current and future needs and support community’s health, social and cultural well-being” (para 8b)

2. NPPF paragraphs 92 to 103 explain in detail the planning requirement of promoting healthy and safe communities. Paragraph 92 a and c provide guidance to support and protect existing services, as well as planning positively for the provision and use of shared spaces and community facilities, that are adaptable and part of an integrated approach to community development.

“a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”

Local

1. The East Devon Local Plan Strategy 3, like the NPPF (2021), also promotes sustainable development. Here social well-being is one of 5 interrelated issues,

“which includes providing facilities to meet people’s needs such as health care, affordable housing, recreation space and village halls.”

2. Strategy 4 balanced communities are promoted through three key components and are described as follows:

“By balanced communities we mean that in any area or neighbourhood there is a match between jobs, homes, education, and social and community facilities. Ideally these should complement the range of ages of the resident population and have appropriate access for those with disabilities in any area.”

3. Strategy 4b focuses on securing social, educational, green infrastructure and health and community facilities.

4. Strategy 12, 13 and 14 provide details on the social and community facilities, neighbourhood centres, and educational facilities that are to be provided for the sites allocated for large scale residential development. Figure 12 shows the provision of community facilities for the residential sites, some of which are strategically allocated sites that are either built or are in the process of being built in Broadclyst Parish. Sadly, some of these community facilities have yet to be provided as provision is determined by the number of houses built.

Residential Sites	Summary of community provision
Old Park Farm (phase 1)	Allotments Local Equipped Area for Play (LEAP) 9 v 9 youth football pitch Parkland 0.75ha park and change facility
Old Park Farm (phase 2)	0.15ha allotments Community orchard 30-year Permissive path
Pinn Court Farm	Skate Park Allotments
Tithebarn Green	Local centre Natural green spaces Sports pitches Play areas Allotments
Mosshayne	Sports pitch Allotments Bird hide Public open spaces

Figure 12: Westclyst Sites Community Provision Table

5. Within the Development Management policies further support and guidance is provided for community facilities and services (E12, 14,) and the specific section on recreation and community facilities is provided within RC1 – RC7.

Consultation

Community Survey 2016

1. The findings of the Community Survey (2016), including the survey appendices, are to be found in Appendices 2 & 7.

2. Questions 4, 5, 8, 9, 12, 13 and 15 in the community survey provided information on this area. Of the seven key findings identified through this process, three were linked to community, and community facilities.

- The sense of community is very important to residents and was ranked first by 55% of the respondents.
- For residents living outside Broadclyst Village there is a desire for more community facilities local to them, particularly in Broadclyst Station and Westclyst.
- 60% of residents responding would like there to be dog-free or dog-specific areas within the parish. The recreation ground and children's play area were identified to be dog-free areas.
- Question 8 asked if there was a need for additional community facilities in addition to the Victory Hall and Pavilions. 35% of the respondents agreed that there was a need for additional community facilities.
- The question also asked those who answered yes what they thought was needed and where it could be built. The full list of responses is included in Appendix 7C. The most common requested additional facilities were a swimming pool and sport/gym facilities. It was suggested these might be linked to Clyst Vale Community College.
- Other suggestions with multiple responses included a community pub or café, something for young people – possibly a skate park or BMX track, and making better use of the Parish Church.
- The most common locations suggested were outside of the main village centre. Westclyst was mentioned as requiring a community space.
- Question 9 asked how respondents might use the Parish Church building more. The most common answers were as a music venue and for art exhibitions. However numerous people also commented that better heating would be required to make it a more useful space, and others suggested removing the pews to make the space more flexible.
- Question 13 asked if additional recreation space was required. Again, there was a broad range of opinions expressed and these are included in Appendix 7D.

Work of the Sports, Recreation and Leisure Steering Group

1. Part of the Steering Group work was identifying the full range of provision of community facilities and assets across the parish. Findings were:

- There are 15 general forms of Sport, Recreation and Leisure offered within the parish.
- The largest number of community opportunities/venues provided for are:
 - Outdoor sports/activities followed by,
 - Cultural activities,
 - Inside social events,
 - Indoor organised sport.
- Broadclyst Village was the centre for most activities, with either no provision or small pockets being provided elsewhere across the parish. Westclyst, at the time of the survey, had no community facilities, nor did Broadclyst Station, Blackhorse, or the other smaller communities. The National Trust are also providers of sport, recreation, cultural and leisure activities.

2. The Steering Group work also identified what type of provision was lacking or not offered in the parish, and outlined potential provision and development to address these unmet needs. These are presented in Figure 13.

Lack of Provision	Potential Provision and/or Development
Lack of bookable space for adult team activities, both indoor and outdoor.	Multi-use all-weather pitch. Indoor sports area with multiple sports options running simultaneously.
No gym and/or fitness provision.	Gym facility either stand alone or within a centre.
No multi-use sports facilities for football, hockey, netball, and rugby training or matches.	Multi-use all weather pitch(es) and changing facilities.
Lack of a floodlight facility providing all year-round evening outdoor activities	Multi-use floodlight lit all-weather pitch and changing facilities.
Lack of sports/leisure linked crèche facilities	Rooms available within or linked to sports/leisure/ gym facility.
Lack of concurrent activities to enable adults and children to participate in different sports at the same time.	Facility that allows multiple activities for both adults and children to run concurrently.

Figure 13: Table showing lack of community provision and possible solutions.

3. Findings on what sports recreation and leisure activities the community leave the parish for were also identified. Many of the activities listed could be provided in an all-weather pitch and a new community sports building. However, there were activities listed that most residents living in neighbouring parishes would also have to travel to such as, water sports, swimming, dry ski slope, cinema, fishing, and golf.

4. The conclusion of the Steering Group was for a Sports Community Hub with an all-weather pitch floodlight lit facility and community building that could provide the following and therefore meet the needs identified by the Steering Group in consideration of the community survey:

- A large community room.
- A café/ social area.
- Gym/ fitness facility.
- Meeting rooms for commercial use.
- Crèche.
- Office space / hot desk facility.
- Changing rooms and toilets.

Sports Clubs

1. The Broadclyst netball, football and tennis clubs were contacted as well as the East Devon Hockey club to ascertain whether these clubs would be interested in the rental and or use of such a facility, and all were strongly in favour.

2. **The Football club** are struggling to secure pitches for both training and matches for their growing junior sides as well as their senior side. Green spaces have been hired in order for training to take place, for example a field next to the New Inn outside Broadclyst Village has been used. At present the recreation ground in the village is the main football pitch but this resource is the only open public space for the community in the village.

3. **The Netball Club** rent courts at Clyst Vale Community College, but this court is limited by poor lighting infrastructure affecting winter use and use as a tennis court affecting the summer months. Indoor facilities at the leisure centre do not allow league games, and renting space is limited due to long-term bookings.

4. **East Devon Hockey** was highlighted in the East Devon Sports Pitch Strategy (PPS 2015¹⁹). They were listed within the priority sport specific actions in the section, “the sand- based Artificial Grass Pitch (AGP) at Clyst Vale Community College to re-home East Devon Hockey Club should they wish to move back from Exeter.” This club with members from the Parish were contacted about their level of interest and support for the multi-use all weather floodlit pitch based in Broadclyst. Presently they use the Jubilee Club, 1km away from the Broadclyst Parish boundary, as a post-match base, and rent training/match pitches across Exeter. They were invited to consider the potential of this facility for the club and its members. East Devon Hockey club were represented in the Community Sports Hub working group.

5. **The Tennis Club** was in support of the hub facility, especially as it would allow the club to play tennis throughout the year using floodlighting. The club was also in favour of the hub offering tennis courses and school holiday courses to boost their membership numbers. The club does not currently have a junior section, with thoughts that this facility could encourage new members as well as providing an introduction and development to new versions of tennis being offered on different playing surfaces.

6. The high demand for artificial pitches for football, hockey and netball found in these clubs across East Devon is understood to be replicated in the city of Exeter. The provision of an all-weather facility offering a range of pitch options and sports is seen as much needed, both locally and in a wider context.

East Devon District Council: Local Plan and Playing Pitch Strategy²⁰

1. The provision of new open space for sports facilities and parks RC2, RC5, RC6 and RC7 (EDLP (2013-31)) provided guidelines for the Steering Group as to the support and criteria required to be met by a site providing a new community sports hub.

2. There is clear support (EDLP (2013-31)) para 25.2 RC5 for additional recreation facilities in respect to new residential development, such as the consented sites in the Westclyst area which bring forward a total of 2,285 new dwellings. Although individual sites have made some sports provision, (see Figure 12) provision for the total number of new houses has not been fully explored or delivered.

3. Para 25.2 also supports recreation and community facility provision in locations where a clear deficiency in facilities currently exists. The most recent East Devon Playing Pitch Strategy (PPS) adopted in June 2015 (Appendix 28) remains relevant and provides a clear steer on the need for improved and / or new facilities.

4. The 2015 PPS showed a general lack of sport pitches for football, rugby, cricket, and hockey across East Devon, and highlighted within the priority sport specific actions the need to provide a new

¹⁹ <https://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/open-space/playing-pitch-strategy/#article-content>

²⁰ <https://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/open-space/playing-pitch-strategy/>

hockey pitch in Broadclyst in association with Clyst Vale Community College sports provision. The need for a hockey pitch in this study was identified in the EDDC Playing Pitch Strategy as a wider need, far greater than a Broadclyst Parish need.

5. The need identified in the EDDC Playing Pitch Strategy for an all-weather pitch was well received by the Steering Group as it not only duplicated local need, but it also evidenced a wider East Devon need which would help ensure the viability and sustainability of such a facility within the parish. Any new facility suitable for sports listed in the PPS (hockey, football, rugby, and cricket) could be expected to draw players and teams from a catchment area stretching across East Devon, Exeter and further afield, regardless of where it may be provided in East Devon.

6. The proposed Community Sports Hub is in support of RC7, Shared Community Facilities, as the hub would provide a dual-use facility, essential for sustainable development.

7. The result of the Steering Group work was to;

1. Confirm and support the aims and objectives of the Community Facilities Chapter.
2. Support the setting up of a NP Community Sports Hub Working Group.
3. Include a large sports facility as part of the Call for Land process.

Community Sports Hub Working Group

1. A Community Sports Hub Working Group was established with the following organisations being involved:

- Leisure East Devon.
- EDDC Planning Team.
- End Users: Clyst Vale Community College, Cornerstone Academy, Football, Hockey and Netball clubs.
- Technical input: Devon Hockey and England Hockey.

2. The role of this group was to pull together expertise to:

- Provide technical input and advice on sporting venues.
- Determine end user interest and commercial use models for a variety of end users.
- Design a community hub model that provides a best fit sporting facility.
- Provide sports facility planning expertise.
- Ensure that the community sports hub is linked to EDLP (2013-31) and EDDC strategic documentation, and community sports funding and projects.

3. The work of this group enabled specific community sports hub details to be presented to the community in the Broadsheet (Appendix 15) and in the second Sites Consultation in 2019 (see Figures 14 and 15), where the community voted for their preferred site and pitch surface.

4. Technical pieces of work were also provided by EDDC planners as part of this group's work. A Heritage Impact Assessment (Appendix 16) on the Brockhill site and a report of Broadclyst Multi-Use Sports Pitches (Appendix 17) was also completed.

5. Technical support and information was provided by Devon Hockey and England Hockey. The requirement for hockey to have a specific need of a 'shorter pile synthetic turf' in the East Devon PPS has been superseded by technological advances, and the recognition that all-weather pitch facilities

must be adaptable for multi game activities to be sustainable. Details of the two main multi game all-weather surfaces available for training and match purposes are presented in Appendix 19.

Call for Sites

1. Question 4 of the Call for Sites Form included a request for land for a large sports area, as seen in Figure 14.

4. What use do you believe the site is suitable for?	
Please tick all uses that apply	Explain why below
Site for 2 Football Pitches and a Clubhouse 201m x 126 or 150m x 165m	

Figure 14: Call for Sites Form Question 5 showing land request for a sports site

2. Football pitches were used to provide an effective visual clue as to how much land was being sought, in addition to that required for a sports facility building.

3. Three sports sites came forward through the Call for Sites process detailed in full in Appendix 19. A sites option assessment was completed by AECOM for one of the sites when the land was put forward for mixed development. All three sites were ranked by East Devon District Council (EDDC) as potential sports facility sites (CSHC, CSHW and CSH B). EDDC recommended that one site should undergo a heritage impact assessment which was carried out on Site CSH B.

Second Site Public Consultation

1. The second sites consultation contained a small number of housing and mixed development sites, as well as a whole section on the Community Sports Hub. This consultation was carried out through attending community and online events.

2. The consultation provided information on the Community Sports Hub including sites and information on what the hub could contain, and the choice of surfaces, as seen in Appendix 19.

3. The Community Sports Hub Consultation findings are presented in Figure 15.

%	DETAILS OF VOTING
87%	Of the community who voted, supported the allocation of a site for a Community Sports Hub in Broadclyst Parish.
84%	Of the community who voted, supported a Community Sports Hub facility being allocated at Clyst Vale Community College. The community voted for the reserve site to be Brockhill rather than Winter Gardens.
46%	Of the community who voted, selected Brockhill CSB as their preferred choice.
33%	Of the Community who voted, selected the Winter Gardens site CSW as their preferred choice.
62%	Of the community who voted, selected the all-weather Surface A: AGP Hockey Plus (this selection offered the biggest range of activities) as their preferred choice.

Figure 15. Community Sport Hub consultation results

4. EDDC carried out a feasibility assessment on CSH C (Appendix 17), which provided justification for the site, raised concerns and suggested potential approaches to addressing them. Recommendations

included the need to commission specialist input, especially in respect of landscape impact considerations.

5. Pre-feasibility specialism from England Hockey and Devon Hockey would provide specialist input on pitches and sports building provision once the Plan was made.

Policies: Context and Justification

The material provided so far in this chapter sets out the context for community facilities in the parish. This material provides the full justification for the policies within this chapter. After each policy there is a further brief justification section.

Policy CF1: Community Sports Hub

Policy CF1 Intent

To allocate land for a Community Sports Hub that provides a range of activities and services for members of the community.

Policy CF1. Community Sports Hub

Land identified in Figures 16 and 17 is allocated for a Community Sports Hub development to include the following:

- **An All-Weather Floodlit Pitch Field of Play (minimum size 110m x 65m*)**
- **A Community Building (minimum size 200 sq. metres*)**
- **A Secure Storage Building (minimum size 18m x 3m*)**
- **A Treed Car Park (minimum size 55m x 22m*)**

Proposals should meet the following site-specific requirements:

- 1. Provision of an artificial grass pitch hockey plus surface or an equivalent surface that provides at least the same range of sporting activities;**
- 2. Any external lighting required should minimise light pollution and with floodlighting times not extending beyond 22:00 and beyond the duration of training and pitch use;**
- 3. The provision of a car park to allow for movement, turning and designated parking for coaches, minibuses, bicycles, cars and the availability of electric charging points. The car park provided should include trees²⁰ (one tree per every 7 parking spaces) to provide shade and enhance the appearance of buildings, sports pitch²¹ and onsite net biodiversity gain. The planting and materials used should integrate with sustainable urban drainage components;**
- 4. The community building should include changing rooms, toilets, kitchen, social/ café space, storage space and rooms for meetings, fitness/ training area and offices (to include a Parish Council office);**
- 5. The provision of pedestrian and cycle access to the site, which should include safe crossing with lights on the B3181 and an extension of the existing pavement from the bus stop and Dog Village;**
- 6. Land for the provision of a public path to the Broadclyst Community Farm (labelled Heathfield Farm in Fig 16) should be safeguarded for future access;**
- 7. The delivery of the landscaping provisions (as indicated in Figures 17 and 18) should include the southern hedge boundary and part of the copse to be enhanced and protected, and a 2m new planted area along the school boundary except where access is required;**
- 8. Where it is practicable to do so, the scheme should utilise roofs of the new buildings for the generation of on-site renewable energy.**

***Prefeasibility studies will inform the minimum size requirements listed.**

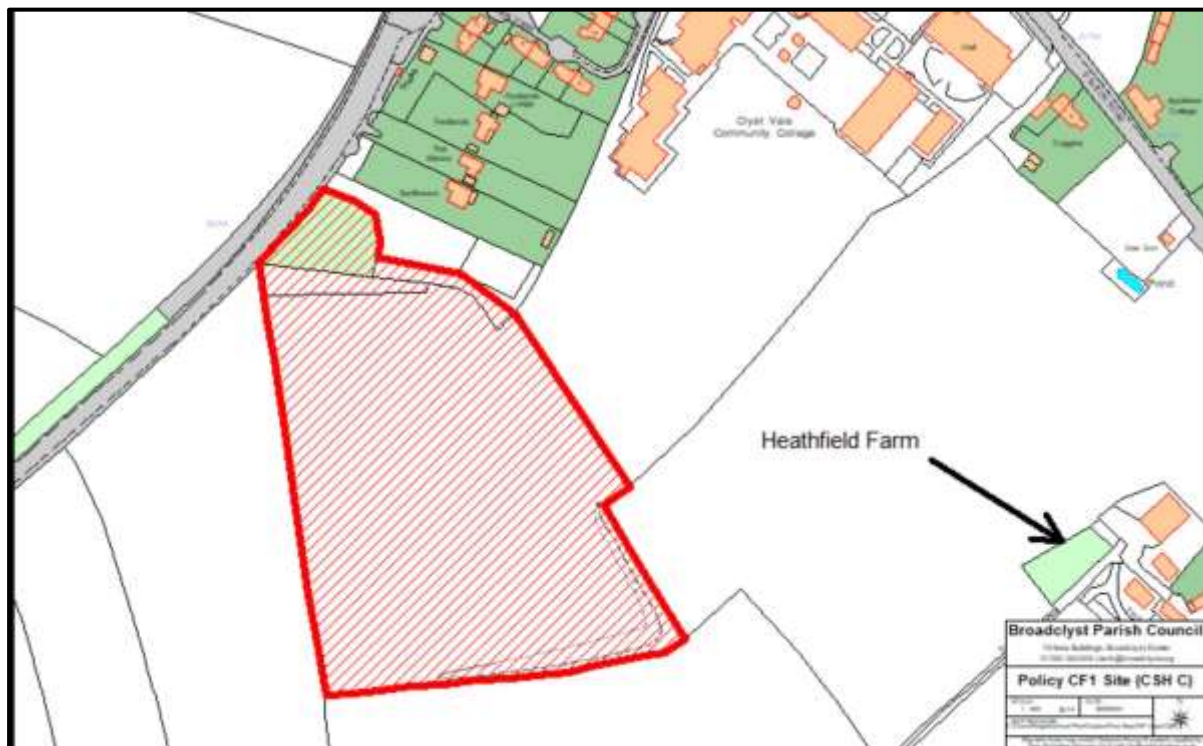


Figure 16: Land allocated in Policy CF1 showing location in relation to: Cyst Vale Community College Site, B3181 Road and Heathfield Farm.

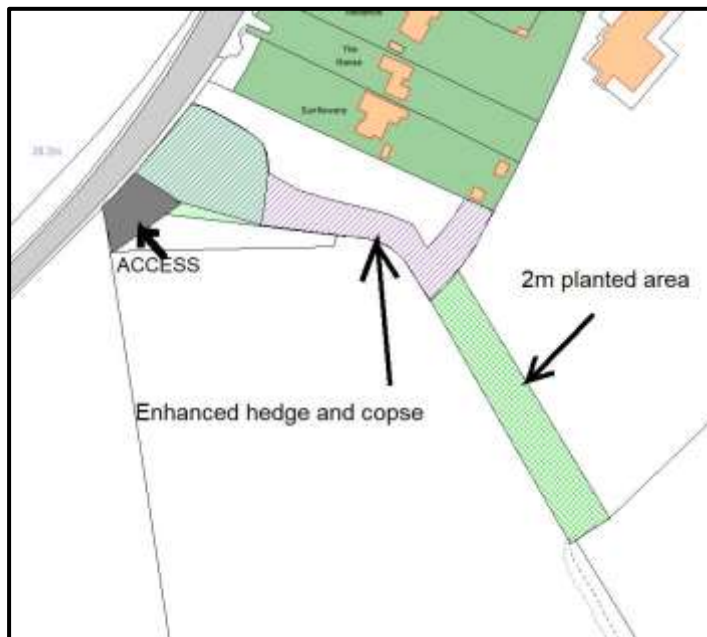


Figure 17: Site CF1 showing access and landscape detail.

Justification Policy CF1

1. For communities to be successful, it is vital that they are well served by a full range of services and infrastructure appropriate to people's needs that are accessible to all. Community facilities enable a variety of activities and make an important contribution to residents' experience of life in the parish. Evidence of need and support is provided by the community survey, the work of the Sports and Recreation Steering Group, EDDC Playing fields Pitch strategy and the Community Sports Hub Groups.

2. Analysis showed there is a variety of accessible buildings and services available to the public, but facilities are poorly spread across the parish. Analysis also revealed a need to allocate a site for a new Sports Hub facility to serve the three largest existing communities within the parish (Broadclyst Village, Westclyst and Tithebarn), within walking and cycling distance of all with public transport accessibility.

3. Regular physical exercise contributes to good levels of health and wellbeing. Aside from benefits to the individual, increased sport participation can begin to tackle wider problems such as social exclusion and reducing anti-social behaviour. It is therefore important that people in all areas have access to good quality spaces and the opportunity to participate in formal and informal recreation.

4. A high proportion of adults and children do not exercise regularly. Increasing participation rates in sport and recreation requires the co-ordinated efforts of many partner organisations. Sports facilities are key community facilities contributing to the overall health and wellbeing of the community, both directly and indirectly. This site is already in sporting use, with this proposed development upgrading the existing facilities to help meet an identified shortfall in the provision of facilities in the parish.

5. The development of the overall package is not without a series of challenges. They will be carefully managed by the Parish Council. If proposals for the site identified in Policy CF1 do not materialise within three years of the granting of planning permission for the proposal the Parish Council will work with the relevant organisations to identify and promote a suitable reserve site. The Parish Council will make a judgement about the need or otherwise for the neighbourhood plan to be reviewed at that time to take account of these circumstances.

6. Car parking areas are rarely visually attractive and should be designed to have a positive impact on the landscape, highlighting the need for incorporation of landscaping in parking areas. Provision of a treed car park is in keeping with Sports England's car park and landscape guidance notes (Appendix 31). This document provides evidence that such landscape features will result in an attractive and inviting environment that people enjoy, improving the long-term appearance of the facility (See Figure 18). Trees are valued for their ability to filter dust, provide shelter and shade, and to assimilate new buildings into their surroundings, softening the visual harshness of extensive car park areas, as well as their role in the carbon cycle. Decision on the specification of quantity of trees was based on tree densities in a variety of public parking spaces locally, including the car parks of Sainsburys, Tesco, Exeter Services, Holiday Inn Express, Wickes and Rydon Retail Park.



Figure 18: Examples of car parks in which trees are utilised as part of the design.

7. Heathfield Farm has a designated woodland close to the preferred site for a Community Sports Hub (Appendix 32), providing a treed backdrop for enhancement of any trees planted within the carpark, facilitating assimilation and complementing the surroundings.

8. The Heathfield project map (Appendix 32) shows a pathway to the B3181. The provision of such access path would be safeguarded in the development of this site, to ensure there is a safe route for accessibility of both sites from the B3181. This access path would also provide a safer route than the existing route along Station Road, which has no pavement, for pupils walking from Clyst Vale Community College to Heathfield Farm or Broadclyst Station.

9. The site lies close to the CVRP which seeks to create a green framework of green spaces linked by trails and public transport. Strategy 10 of the EDLP (2013-31) gives this area protection. Within the policy, the specific requirements of 2, 3, 4, 7, 8, and 9 demonstrate that the site is broadly in conformity with the CVRP masterplan and Strategy 10. The proposed allocation and the design policies within the Plan were assessed against the eight CVRP masterplan objectives, and were found to align and be compatible with these, as seen in Figure 19.

Clyst Valley Regional Park Objectives (Strategy 10)	Policy CF1
1. To enhance the health and wellbeing of residents.	Yes.
2. To create opportunities for people of all ages and abilities to learn outside the classroom.	Yes.
3. To protect irreplaceable habitats, restore natural processes, ensure that internationally important wildlife sites achieve their conservation objectives, and increase the size, quality, quantity and connectivity of priority natural habitat and populations of key species.	No: Extensive tract of playing field (grassland) is lost. Yes: Extension of the copse, addition of trees on site (in the car park) and a new hedge, will provide new natural habitats and connectivity.
4. To rapidly reduce greenhouse gas emissions and increase resilience to extreme weather events and rising sea levels.	Yes.
5. To achieve good ecological status in the river Clyst and tributaries, enhance natural flood storage and restore soil health.	YES: semi permeable structures and water storage design features.
6. To restore landscape character and promote local distinctiveness and to maintain the high landscape setting of Killerton.	This site will promote local distinctiveness but, in its

Clyst Valley Regional Park Objectives (Strategy 10)	Policy CF1
	development, it will not be able to restore or maintain the existing landscape character of a grassed playing field.
7. To protect historical landscapes, sites, buildings, and their settings, enhance where appropriate and promote public access to and enjoyment of them.	N/A
8. To increase and sustain high value jobs.	Yes

Figure 19: Alignment of CF1 with the CVRP masterplan objectives

10. Changes recommended by EDDC, DCC (Consultation responses) and AECOM (EBPD) have been added to the text to make Policy CF1 considerably more effective. For example, DCC noted that:

“may need rearrangement to B3181 in terms of right turn provision (achieved by lining rather than widening) and advance signage of the playing fields to ensure drivers are not confusing a right turn signal with the right turn island shortly after. Proposals should also include provision for pedestrians to cross into the site (as likely to have locals, including younger users, coming by foot) - possibly requiring a refuge island on the B3181.”

Recommendations such as these provide justification for policy site specific details.

11. Community feedback showed high level support for a facility for a variety of reasons. Most regarded this would be a real asset to the parish. Provision of a facility such as this, close by two centres of population, was noted to result in less vehicular use as presently a large percentage of sports require a drive out of the parish, whereas this facility could be accessible by foot or bicycle.

12. Community feedback also requested that the Sports Hub should benefit the local community and ideally be used by local individuals, suggesting local teams and groups receive priority booking. This is probably in light of bookings in a sports centre locally, where bookings are monopolised by a third-party, meaning community bookings are often limited. Sadly, such a clause cannot be written into policy but has been passed to the Parish Council to be utilised in management discussions.

Policy CF2 New and Enhanced Sport, Recreation and Community Facilities

Intent Policy CF2

To support proposals that will provide new and enhanced community facilities in suitable locations across the parish. To ensure that developments provide an overall gain of community: space, use and/ or provision.

Policy CF2. New and Enhanced Sport, Recreation & Community Facilities

Proposals for new, or enhanced or extended existing, indoor, or outdoor sport, recreation and/or community facilities, will be supported where they meet the following criteria:

- **the proposal and any associated ancillary facilities, such as changing rooms, should be of an appropriate scale and design for community use;**
- **the proposal is designed to minimise its environmental impacts, including, where necessary and appropriate, controlled hours of working;**
- **the provision of sufficient and safe parking provision on the development site to accord with Policy T3 of this Plan; and**
- **the access arrangements enable and encourage active travel for pedestrians and cyclists and safe vehicular access.**

Justification Policy CF2

1. Planning's role involves protecting existing assets and promoting provision through the planning process; it makes sure demands arising from new development do not result in a shortfall in the provision of facilities. With a housing growth of 3158 new dwellings, there is going to be an increased pressure on existing community facilities, presenting a shortfall in facility provision. This shortfall will be created by:

- Increase in the parish population,
- Creation of new clubs, and
- Enforced expansion of existing clubs such as Rainbows, Brownies and Guides.

2. Planning also has a role in promoting the provision and enhancement of new facilities through a positive policy approach towards such development, and where necessary through site allocation. This policy will potentially support development of community facilities in areas that are less well served in the Parish. This positive policy is also for existing facilities to remain as a vibrant focus for community activities, and for conversion to extend provision and/or space to new groups within the community.

3. In keeping with all public consultations on Sport, Recreation and Leisure, the Community Survey (2016) revealed strong support for a swimming pool being provided within the parish, with 21% of responders' comments relating to the provision of a swimming pool. The percentage is much higher when considering requests for a swimming pool in relation to other single item requests. Appendix 7C not only provides evidence of support for a swimming pool, but provides further details on the nature of the provision:

- A dual-use facility with Clyst Vale Community College.
- A community swimming pool.
- A shared use facility with dedicated public access (E.g., daytime, evenings and in school holidays).

2. Design and Climate Change

1. This chapter addresses the community's opportunity to develop a positive vision of their future by mapping out ambitious plans that will improve quality of life, at the same time as making changes to tackle climate change and facilitate the move to a low carbon energy system.

2. This chapter is aims to aid designing and planning of developments that respect the past, the present, and the future needs of the community and environment. This is reflected in the layout. The chapter is not a definitive list of design policies, as there are design and renewable energy generation policies throughout the NP, including within other chapters. In the Natural Environment Chapter, for example, the green spaces policies will ensure these green spaces remain, and that planting is protected and adapted to help battle carbon emissions and rising temperatures.

3. This section covers policies which focus on design principles for development, which can be integrated into any site being developed through a planning application. It therefore includes design principles for: existing buildings and extensions; protecting, conserving, and enhancing the historical and natural environment; adaptation to climate change and a low carbon energy system.

4. The material provided in this chapter sets out the context for the community's requirement for design, and for climate change to be a significant part of the NP policies. This material provides the full justification for the policies within this section of the chapter and after each policy or group of policies there is a further brief justification section.

5. The chapter and policies are subdivided into three sections:

- A. This first section has a policy which focuses on establishing and/ or maintaining a strong sense of place, which is sympathetic to local character and history. This policy is coded D.
- B. The second section focuses on history and heritage, including policies related to design and policies for the enhancement and conservation of heritage. These policies are coded DH.
- C. The third section contains policies associated with climate change. These policies are coded DC.

Design

Introduction

1. Places affect us all – they are where we live, work, and spend our leisure time. Well-designed places influence the quality of our experience, encouraging more time to be spent in and around them. We enjoy them as occupants or users, or simply as passers-by and visitors. They can lift our spirits by making us feel at home, giving us a buzz of excitement or creating a sense of delight. They have been shown to affect our health and well-being, our feelings of safety, security, inclusion and belonging, influencing our sense of community cohesion.

2. A place is more complex and multi- faceted than a building:

- It is a setting for a diverse range of uses and activities that will be experienced by different people in different ways.
- Whilst it is made of buildings, it also has important landscape and infrastructure which are likely to endure longer than the buildings themselves.
- Most places evolve over a long period of time once established, with many incremental changes affecting their quality.
- The quality of 'delight' includes a richness of experience gained from all of our senses, not only sight.
- Beauty in a place may range from a long view down to the small detail of a building or landscape, and

- Like places, 'good design' is a multi-faceted concept, going far beyond the architectural style of buildings.

3. The underlying purpose for design quality, including new development, at all scales is to create well-designed and well-built places that benefit individuals and communities. This chapter is centred on Broadclyst Parish as a well-designed and well-built 'place', benefiting people at all stages of life who will have differing abilities– children, young people, adults, families, and older people, both able-bodied and disabled. These people will spend time within Broadclyst Parish for a range of purposes: to live, to work, to shop, for leisure and recreation, to move around between these activities, and for those who visit or only pass through.

4. The development of a "quality place" for the local community is supported by the NPPF (2021) who confirm that neighbourhood planning is at the heart of the drive for quality development in an NP Area,

"Design policies should be developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development" (paragraph 127).

5. The report 'A Housing Design Audit for England' (2020)²¹ evaluated over 140 residential development schemes built during 2014-2019 and compares results to those of the previous audits by Commission for Architecture and the Built Environment (CABE) in 2004-2007. Schemes in the Southwest exhibited results significantly skewed towards lower scoring categories, with 32% of schemes classed as 'poor' or 'very poor'. At 2.80, the overall average design score for the region is significantly below the national average of 3.12 and falls in the bottom two out of nine regions assessed in England. While there has been a 13% increase in the number of good and very good schemes between the audit years, this has been outweighed by a 19% increase in the number of poor and very poor schemes.

6. The picture of a decline in housing quality design is recognised and acknowledged by the community of Broadclyst. Social media has made it easy for information to be highlighted and shared on the design and build quality of the new housing developments within and adjacent to the parish.

7. There is growing community recognition that design is important. It was interesting to note that community consultation events, although consistently providing support for houses and economic development, revealed concerns over the details of design such as:

- What is it going to look like?
- What place will the new development create for those who live there?
- How can high quality design be achieved and ensured?
- How is it going to impact on our heritage and character landscape?
- How is it going to be resilient to climate change?
- How is it going to impact on our natural environment: habitats and biodiversity?

²¹ <http://placealliance.org.uk/research/national-housing-audit/>

Importance of Design

There is a wealth of information on good design. The National Planning Policy Framework (NPPF 2021), the East Devon Local Plan (2013 – 2031), the National Design Guide (NDG, 2021), and the “well designed places tool kit” from Locality 28 provide a wealth of information on good design and the opportunity to provide local context and distinctiveness within the Neighbourhood Plan. In the Local Plan, design recommendations are dispersed throughout the Plan with strategy 48 covering local distinctiveness in the built environment. Within the Development Management policies there is a specific section on design. Details on design and good design is provided in Appendix 14C.

Work of the History and Heritage Steering Group

1. The Broadclyst NP History and Heritage Steering Group spent time identifying local heritage features and listed structures within the parish. The Group also undertook a character assessment of Broadclyst Parish which is presented in Appendix 14B. This lengthy document assessed different areas within the parish documenting settlements, areas within settlements and communities under the following headings:

- General Overview.
- Layout.
- Spaces.
- Roads/ streets/ routes.
- Green and natural features.
- Building and details.
- Landmarks.
- Land use.

2. This work resulted in the development of a Parish Design Code Document (Appendix 14A). This document outlines design code guidelines which aim to establish the basic framework for place making for each character area within the parish, aiding design to be informed by context. Understanding the site’s features and its setting is essential. The philosophy behind these guidelines is that all new development and modifications to the existing built environment should not be viewed in isolation.

3. It is not only about individual buildings, but how streets, spaces and buildings interlink together to create a place that people want to live in, visit and care for. When dealing with small infill and building alterations, design must be informed by the wider context, considering the immediate neighbouring buildings and the townscape and landscape of the wider locality.

4. The local pattern of streets, spaces, building traditions, materials and ecology should all contribute to the determination of the character and identity of a development, whilst appreciating that new building technologies can deliver acceptable built forms and may sometimes be more efficient.

5. It is important with any proposals that full account is taken of the local context and that the new design is consistent with the density, height, and mass of the surroundings, embodying the “sense of place” while also meeting aspirations of people already living in that area.

6. Context does not mean to copy or use pastiche solutions. It means using the surrounding area as inspiration and influence, helping to form a contemporary solution that is in harmony with the surroundings. These guidelines will outline the elements that make important reference points within an area.

7. The group also looked at ways to extend and celebrate the historical heritage of the parish. Policies to ensure this are presented in the Heritage policy section.

Section A Policies

Policy D1: High Quality Design

Intent Policy D1

The policy sets out the key design principles to which new development within Broadclyst Parish should seek to adhere. It aims to ensure that development proposals are designed in a manner that not only respects and responds positively to, but also enhances the existing character of the local area and supports the creation of spaces and places that are locally distinctive, attractive, and functional.

D1 High Quality Design

Development proposals should be designed to achieve high quality design which responds positively to the Broadclyst Parish Design Code 2021 (as set out at Appendix 14) and the guidelines and principles set out in the Conservation Area Appraisal²³ and the East Devon Heritage Strategy²⁴.

As appropriate to their scale, nature and location, development proposals should be designed to:

- 1. Respect and/ or complement local character setting in relation to the height, scale, layout, orientation and spacing of buildings as in the Broadclyst Design Code and draw inspiration from the best and most locally distinctive buildings.**
- 2. Minimise significant impact on the visual amenity of the local and wider setting of the surrounding built and natural landscapes and in the varied streetscapes within the parish.**
- 3. Ensure proposals that seek to introduce innovative or non-traditional designs that can add to the local context and character will only be supported where a robust design rationale is presented and is in line with NPPF (2021) paragraph 134.**
- 4. Recognise and reinforce local character by utilising locally sourced materials as appropriate, in relation to buildings and boundary treatments. The appropriate use of local stone walls or hedgerows is supported.**
- 5. Create well defined, attractive and secure streets and spaces benefiting from good levels of natural surveillance and designed for mitigating climate change.**
- 6. Ensure where external lighting is proposed, adverse amenity and environmental impacts are to be avoided and that power is to be sourced from renewable energy. In the rural areas of the parish ensure light pollution does not harm the prevalence of dark skies at night.**
- 7. Create attractive climate resilient planted frontages and gardens and where possible, integrate green and natural features such as trees, hedgerows and grass verges into the proposal.**
- 8. Ensure road safety is not compromised, in particular taking into account access points, crossing points and blind corners.**
- 9. Link into and enhance the existing pedestrian and cycle network and facilitate future connectivity and sustainable transport options where practical.**
- 10. Ensure appropriate and safe site access in the following priority order: pedestrians, cyclists and vehicles. To ensure this priority is also provided in low traffic neighbourhoods (see Policy T4).**
- 11. New signage requiring consent and providing route identification should maximise clarity, legibility and amenity.**

Justification Policy D1

1. This policy provides a positive framework for the achievement of high quality and inclusive design for all development, as required in the NPPF (2021) Section 12. The policy recognises the value of local distinctiveness, and how the existing character of Broadclyst Parish can be used to help inform new development proposals. At all consultations the need for development to be visually appealing, well placed, and well-designed was a consistent theme, with the high-quality design policy and the development of a local design code being fully supported.

2. A Design Code of Broadclyst' Parish was produced to support this policy. This document was produced using information presented in the Character Assessment of the parish. The character document provides key design qualities and characteristics that define the parish and the surrounding landscape setting. The NPPF (2021) recognises the value of local distinctiveness and supports the use of such characterisation studies to underpin and inform planning policy.

3. This policy also provides support for designs that introduce new and innovative architectural forms to the area that are underpinned by a coherent sustainable design rationale to enhance the reputation of the parish and overall design quality in the local area.

4. The policy is not a complete design list, as other policies throughout the Plan provide design guidance. The existence of other design-based policies is to highlight that the design theme runs across chapters of the Plan. The local community was strongly in support of the opportunity to create a vision for the future of their area through neighbourhood planning, by agreeing what is special and how character can be preserved or enhanced and by enabling appropriate sustainable new development.

5. The community are not averse to development but want a policy such as this to ensure good design. This policy results in proposals having regard to the content of the Broadclyst Design Code and designing to respond positively to the defined local character. This policy, with the other design policies, will ensure that all future development enhances local distinctiveness, creates a strong sense of place, and contributes positively to the creation of a well-functioning, sustainable, visually attractive, safe and accessible environment strongly advocated by the community at consultations.

6. Policy D1 guides well-designed development to make an important contribution to prosperity and growth to the parish. At the same time, it can be used to prevent development that is poorly designed or in the wrong place. Good planning delivers the new homes, shops, employment, and services that communities want and where they want them, whilst protecting the places that matter to the community.

7. The policy is in general conformity with relevant national and local policy on design but is Broadclyst-specific. For each point in the design policy, the Design Code provides detail that expands the policy and goes beyond the restatement of higher-level policies (EDLP (2013-31) and National NPPF 2021). The examples provided below illustrate this point:

Example 1.

EDLP (2013-31): Design and Local Distinctiveness 1. Respect the key characteristics and special qualities of the area in which the development is proposed.

Broadclyst Neighbourhood Plan: 1. Respect and or complement local character setting in relation to the height, scale, layout, orientation and spacing of buildings as in the Broadclyst Design Code and draw inspiration from the best and most locally distinctive buildings.

- Local character detailed information is provided in the Broadclyst Design Code and the Character Assessment appendix provides key features for each community within the parish.
- Heights scale layout and spacing of buildings is additional and is expanded on in the Design Code.
- There is an additional reference to best and locally distinctive buildings, so that developments reference and include such features within the planning application process.

Example 2.

Broadclyst Neighbourhood Plan: 3. Recognise and reinforce local character by utilising locally sourced materials as appropriate, in relation to buildings and boundary treatments. The appropriate use of local stone walls or hedgerows is encouraged.

This policy draws attention and provides examples of locally sourced materials. Examples of boundaries that are appropriate in the parish are provided in the Design Code.

Design and Heritage

1. Heritage – both built and natural – defines the character of the places where people live and underpins the quality of life and work.
2. While the Natural Environment Chapter is about conserving and enhancing the natural heritage landscapes, this chapter also provides a focus on conserving and enhancing the historic environment which is integral to the character of the parish.
3. This focus on historical assets is supported in Section 16 of the NPPF (2021) with paragraph 189 stating;

“Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations²².”

Local Heritage

1. The NPPF (2021) recommends that the extent and nature of heritage assets in the area should be identified, and that heritage assets of particular significance should be highlighted. This includes the number of listed buildings (categorised by grade), conservation areas, scheduled monuments and other heritage designations. This has been completed and is presented in the Broadclyst Design Code (2021) Appendix 14A.
2. The Parish’s historic assets predominately lie within the Killerton Estate, and there is clear guidance provided by the National Trust in their publication “Guide to Heritage in Neighbourhood Planning” (2019) Appendix 20. This publication is intended to help communities take a lead in planning for historic areas, by enabling them to identify and safeguard local heritage in the places they live, work and spend their leisure time.

²² The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making.

3. An essential part of the heritage evidence base is in understanding how historic buildings and areas are used by the public, businesses, organisations and other stakeholders, and how they support the local economy and community. This includes identifying the economic, social, community, environmental and other values of heritage.

4. Values of heritage range from:

Productive to economic use: The Killerton Estate offers this as its buildings have utility value and are in productive use. These include commercial space, residential accommodation, commercial agriculture, agricultural storage, community, and recreational uses.

Regeneration and enterprise use: Historic places can form a basis for sometimes dramatic physical and economic transformations, especially in areas that have experienced commercial or industrial decline. They can provide flexible and affordable floor space, essential for supporting new small businesses and enterprise. Rural and agricultural buildings can support diversification. Historic environments can help to project a positive image and attract investment, jobs, population, and visitors to an area. In the NP, the Killerton Estate has put forward sites (including historic sites) for regeneration and enterprise use.

Tourism: Historic places and buildings help to form identity and distinctive character within an area. This is key to attracting tourists and visitors, supporting a range of local businesses. Killerton House and Garden, and the Estate holiday cottages bring this heritage use and value to Broadclyst Parish.

Skilled employment: The maintenance and repair of historic buildings creates skilled employment (professional, technical, skilled manual and vocational), including craft-based jobs. Building refurbishment generates higher levels of pay and investment in local urban and rural economies.

Housing: Historic buildings can add to the variety, choice, and quality of housing in an area, from well-established terraced streets to rural cottages. Equally, identifying opportunities for new housing or building conversions in and around areas can be an effective way of enhancing viability, supporting local businesses, and increasing use of community facilities. The Killerton Estate is a major house provider in Broadclyst Village and the northern end of the parish, and development of more houses across the area will ensure that the Killerton heritage style will be continued as well as providing enhanced viability to the area.

NPPF (2021) and EDLP (2013-31)

1. The National Planning Policy Framework 2021 includes specific policy sections on conserving and enhancing the historic environment. Paragraph 190 is of particular importance:

“Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation,

b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring,

c) the desirability of new development making a positive contribution to local character and distinctiveness; and

d) opportunities to draw on the contribution made by the historic environment to the character of a place”.

2. Paragraphs 201 and 202 provide further detail outlining legislation in relation to the harm of heritage assets:

“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a) the nature of the heritage asset prevents all reasonable uses of the site; and

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d) the harm or loss is outweighed by the benefit of bringing the site back into use”.

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. (para 202).”

3. On a more local level the EDLP (2013-2031) covers heritage in the design standards policies and more specifically in policies EN6 to EN10.

Section B Policies

The policies in this Plan are to compliment those in the EDLP (2013-2031) by providing policies which are locally focussed.

Policy DH1: Historic Character

Intent Policy DH1

History and historical development has shaped the parish we see today, giving each community its special, distinctive character. The purpose of Policy DH1 is to protect and enhance the Conservation Area and designated and non-designated historical assets which provide a historical backdrop to the character of the parish.

Policy DH1. Historic Character

All new development:

- **Affecting the Broadclyst Conservation Area and / or**
- **Affecting a heritage asset or its heritage landscape setting (Appendix 14)**

should conserve or enhance the significance of the heritage asset concerned.

To be supported, new development should provide a detailed design and layout proposals for the site to reduce impacts on the historic environment, to include features such as:

- 1. Conservation and enhancement of designated and non-designated heritage assets and their settings;**
- 2. Maintaining the historic pattern of development by building in context to the historical area and/or asset;**
- 3. Complementing the human scale, height and massing of the existing historic development in the immediate streetscape and in the wider setting;**
- 4. Reinforcing local identity either by use of the traditional materials found in the Conservation Area and in other historical structures, or by using contemporary building materials that improve the energy efficiency or renewable energy generation capacity of the building which are sympathetic to the existing architectural style.**

Justification Policy DH1

1. Policy DH1 acknowledges the different historic spaces within the parish, and aims to protect, strengthen, and enhance each historic asset and its setting. The dominance of the Killerton Estate in the parish ensures that the heritage of the parish remains and flourishes, but this policy is designed to recognise and include heritage assets beyond the Killerton Estate that need protection, conservation, and enhancement.

2. The community consultations revealed that the locals value the historic spaces within the parish and the strength of this policy and similarly aimed policies. This was noted by Historic England who stated,

“we applaud the extent to which your community demonstrates how it values its distinctive local historic character and how this is reflected in the range of related policies”.

3. The parish community are living with the development of Westclyst, Tithebarn and Cranbrook, and are therefore becoming increasingly aware of the ‘settings’ and the ‘wider settings’ that these new developments are creating. Such visual and wider settings have evolved within a 3-year time frame and have resulted in the community obtaining a raised awareness of how landscapes change. In turn, this has resulted in strong community support for conservation of the natural and structural historical environment, and their settings to be included in policy.

Policy DH2: Development of Existing Buildings in and adjacent to the Conservation Area

Intent Policy DH2

The purpose of Policy DH2 is to protect and ensure that development in or adjacent to the Broadclyst Village Conservation Area is in keeping with the area and its heritage listing.

DH2. Development of Existing Buildings in and adjacent to the Conservation Area

As appropriate to their scale and nature, proposals for the conversion and/ or extension of existing buildings within or adjacent to the Broadclyst Village Conservation Area²⁶ (Figure 7) should ensure that design of the following features will enhance the fabric and setting of heritage assets, as documented in the Broadclyst Conservation Area appraisal, and will support heritage-led regeneration:

- **Boundary treatments (appropriate materials, height, and scale)**
- **Signage**
- **Overhead lines**
- **Infill development at appropriate scale and density**
- **Green spaces**
- **Parking**
- **Palette of materials**

The incorporation of appropriately scaled, sensitively selected energy efficiency measures in historic buildings will be supported where any harm to the asset concerned does not unacceptably detract from the overall integrity of the asset concerned.

Justification Policy DH2

1. This policy recognises the importance of this area within the parish, which has 75 listed buildings and good quality national examples of estate cottages and alms houses with a distinctive vernacular. Recent additions of structures have led to loss of character and intrusion, so this policy guides future proposals to conserve and enhance this area by providing a bullet-point list to ensure that design is locally determined.
2. The policy also supports proposals that bring forward enhancements. A community action encourages parishioners to consider the extent of the Conservation Area in the future, so this asset can evolve further.
3. This policy recognises that historic buildings are not energy efficient and encourages such buildings to be sensitively upgraded, utilising measures that ensure historic character is not lost. With advances in materials and technology, this is an area of house design and improvement design that the local community are in support of.

Policy DH3: Historic Restoration

Intent Policy DH3

The purpose of this policy is to acknowledge that historic buildings are often in need of restoration and that part or whole restoration is supported by the local community to ensure that the parish's heritage is preserved for future generations.

DH3. Historic Restoration

Proposals for part and/ or full restoration and/or enhancements to the fabric and setting of heritage assets (archaeological or historic assets below or above ground) will be supported, where the proposal:

- **Provides an assessment of the character of the asset, its context and significance;**
- **Show how the development fits with these specific heritage characteristics; and**
- **Offers a specific and measurable improvement to the historical integrity of the structure and/ or its setting.**

Justification Policy DH3

1. This policy encourages and supports restoration of historical features within the parish, especially those the community have identified as having local significance. These are: Carrow Mill on the River Clyst near Clyst Honiton; the medieval remains of the undercroft of the manor house in the Broadclyst Village churchyard wall; the Stocks in the Broadclyst Village churchyard; and Westwood Bus Stop.



Figure 21: Carrow Mill structures appropriate for part or whole restoration.

2. This policy was noted by Historic England who stated that,

“we note policy DH3 which promotes the restoration of locally valued heritage assets, which in our experience is a first for Neighbourhood Plans being produced in the South West.”

Design and Climate Change

1. The Government has described neighbourhood planning as

“a tool that will give people ‘the power to shape the future of their local area.’ However, one single issue looms large over the future of all local areas. The changes we will all experience as a result of climate change mean that any plan made now that does not consider climate change and energy as central themes will simply not be fit for purpose.” Hugh Ellis, Head of Policy, Town and Country Planning Association, 2018.²³

2. A specific Steering Group was set up to look at climate change and to develop policies for this area. Their work entailed researching climate change legislation (see Point 3 below) in order to

²³<https://www.cse.org.uk/downloads/reports-and-publications/policy/community-energy/energy-advice/planning/renewables/low-carbon-neighbourhood-planning-guidebook.pdf>

provide information on the climate change issues for Broadclyst Parish, as seen in Figures 22 & 23, and to design policies that help mitigate these impacts.

3. In the Design and Climate Change Evidence Document (Appendix 9) the following material is presented.

- Global warming and climate change.
- UK Governments commitment to Net-Zero carbon by 2050.²⁴
- Devon Climate Change Declaration.²⁵
- East Devon Climate Change Strategy.
- Broadclyst Parish Council (BPC) Climate Emergency.²⁶

NPPF (2021)

In section 2 there is support for achieving sustainable development, and the environmental objective refers to “mitigating and adapting to climate change, including moving to a low carbon economy.”

EDLP 2013- 2031

1. The 2016 Local Plan precedes the NPPF (2021) and the National and Local Emergency Climate Change declarations. Despite this, the Local Plan is in support of sustainability, with section 17 containing strategic policies in support of preventing climate change and using renewable energy.

2. Within the development management policies there is a section on design standards. The Local Plan provides active support for maximising energy efficiency for existing and new buildings, as well as the delivery of renewable energy and low carbon infrastructure. There is recognition that zero-carbon buildings, and renewable and low carbon energy projects will be required within the Plan period.

3. In 2019 EDDC declared a climate change emergency, producing a Climate Change Strategy 2020-25²⁷ in July 2019, with the aspiration to be carbon neutral by 2040. In this document, EDDC declares a commitment to;

“manage the risks posed by climate change and reduce our greenhouse gas emissions. We are committed to promoting and enabling a shift to more sustainable and low carbon operations.”

Broadclyst Parish Climate Change Focus

1. Historically, Broadclyst Parish has experienced the problems listed in Figure 22, and it is these problems that were considered in relation to design and the production of design policies in this chapter.

Number	Design Issues for Consideration
1	Flooding of roads and farmland.
2	Extensive loss of high-quality agricultural land for residential and commercial development.

²⁴ <https://www.gov.uk/government/news/uk-becomes-first-major-economy-to-pass-net-zero-emissions-law>

²⁵ <https://democracy.eastdevon.gov.uk/documents/s7944/EDDC%20Climate%20Change%20Strategy.pdf>

²⁶ <https://www.broadclyst.org/parish-council/council-business/climate-change>

²⁷ <https://democracy.eastdevon.gov.uk/documents/s7944/EDDC%20Climate%20Change%20Strategy.pdf>

Number	Design Issues for Consideration
3	Lack of car parking spaces.
4	Traffic (density and speed), noise and air pollution.
5	Poor walking, cycling and road infrastructure.
6	Lack of green community spaces within or close to settlements and communities.

Figure 22: Table showing community issues experienced in the parish.

2. Research²⁸ indicates that the effects of climate change for Southwest England during the period 2040-2059, compared to the period 1981-2000, are likely to increase annual mean temperatures by between 2-3°C, and increase mean precipitation by +10% to +20% in winter and reduce mean precipitation by -20% to -30% in summer.

3. Resulting from these climate changes, a range of risks may exist for the Broadclyst Neighbourhood Plan area. The list presented in Figure 23 shows what the key design considerations and issues will be for Broadclyst Parish with the predicted climate changes.

Predicted Climate Changes	Key Design Considerations
Flooding.	<ul style="list-style-type: none"> • Treatment of surface water. • Property flood mitigation designs. • Water storage and management. • An increase in green spaces. • Permeable surfaces for parking. • Good garden designs. • River flood prevention schemes. • Provision for on-going and future maintenance of assets, such as flood defences, and allowances for flood resilient and flood resistant construction.
Rise in Temperature.	<ul style="list-style-type: none"> • Efficient water use. • Water collection systems. • Heat efficiency of buildings. • Drought resistant planting schemes. • Utilisation of solar power.
Air Quality.	<ul style="list-style-type: none"> • Housing ventilation and windows designs. • Increase in sustainable transport options. • Reduction in levels of traffic. • Reduction in carbon emissions. • Increase in carbon storage capacity through planting and landscaping.
Noise Quality.	<ul style="list-style-type: none"> • House building designs. • Use of landscaping, planting, and noise buffers.
Light Pollution.	<ul style="list-style-type: none"> • Change of lighting energy source. • Reduction in lighting hours by solar activated lighting.

²⁸ Met Office (2018): 'Land Projection Maps: Probabilistic Projections', [online map] available to access via: <https://www.metoffice.gov.uk/research/collaboration/ukcp/land-projection-maps> [accessed 13/04/20]

Predicted Climate Changes	Key Design Considerations
Existing or increased emission levels.	<ul style="list-style-type: none"> • Identification of opportunities and support for renewable or low carbon energy supply systems. • Identification of opportunities and support for infrastructure, land use, landscaping, and planting to reduce emissions. • Reduction in vehicular movements and increase in use of active sustainable transport options and infrastructure.

Figure 23: Table showing key climate change issues for Broadclyst Parish

4. The six effects of climate change for the Plan Area, shaded in blue in Figure 23, provide a template for the policies of the Broadclyst Neighbourhood Plan to ensure that the correct mitigation and support is embedded/ addressed within the Plan. In the key design consideration section of Figure 23, some of the content is shared between the affects. For example, landscaping and planting is seen as important in combating several areas affected by climate change.

Section C Policies

Policy DC1: Energy Efficient New Buildings

Intent Policy DC1

Policy DC1 sets out sustainable design principles to enable all new development within Broadclyst Parish to maximise energy efficiency of new buildings, using the best of modern design and technology to minimise demand for energy and maximise supply of energy from low carbon and renewable sources.

Policy DC1. Energy Efficient New Buildings

All new development that ensures a “fabric first”^{*} approach to reducing carbon emissions will be supported.

Residential dwellings with recognised high energy efficient standards such as certified PassivHaus and/ or a comparable standard will be particularly supported.

****Fabric first’ means ‘maximising the performance of the components and materials that make up the building fabric before considering the use of mechanical or electrical building services systems. Consideration should also be given to modern methods of construction’.***

Policy DC2: Increasing Energy Efficiency of Existing Buildings

Intent Policy DC2

To improve the energy efficiency of existing buildings and to reduce their use of fossil fuels.

Policy DC2: Increasing Energy Efficiency of Existing Buildings

Insofar as planning permission is required, proposals for the refurbishment and extension of existing residential properties and commercial buildings should be designed to maximise their contribution to the energy efficiency of buildings and use of renewable energy sources.

Proposals which would contribute to energy efficiency and integrate renewable and low carbon heat and electricity production will be particularly supported.

Justification Policies DC1 and DC2

1. Some of the dwellings, workplaces, and community buildings in Broadclyst are old and very poorly insulated. Some properties are subject to draughts, and some are damp. Often these properties have a high demand for space heating. Decarbonising and adapting the parish's housing stock is critical for meeting emissions targets of carbon neutrality by 2040 (EDDC), and the legally binding national target of net-zero carbon by 2050. Even if all new housing planned in the Broadclyst Neighbourhood Plan were to be carbon neutral, this would not be enough to achieve significant carbon reductions as the new houses would be a small proportion of the housing stock in the Plan area. Policies DC1 and 2 encourage the promotion of energy efficiency improvements to all existing buildings, as well as carbon neutral targets for new buildings, in order to support the overall energy efficiency targets.
2. New housing can be much more energy efficient than old housing and there is also scope to install low carbon and renewable energy supplies. The best of modern technology and design creates the opportunity to build houses that will be very low carbon over the course of their lifetime, including the construction of the houses, space heating, and use of appliances within the building. Policies DC1 and DC2 make Broadclyst Parish a place where the best of modern design and technology is mobilised to create new houses and other buildings which are at the forefront of the race to build a carbon neutral Britain.
3. For houses, old and new, Policies DC1 and DC2 require development proposals to include renewable energy capability and to reduce reliance on carbon-based energy sources in order to mitigate against global warming. Most of the properties in the parish are heated by fossil fuels: gas in the main built up areas, and oil in outlying farms and hamlets. Some buildings are heated by electricity heaters, with the electric supply for most properties coming from the National Grid, although there is a recent increase in small-scale generation on site. There are many ways in which Broadclyst Parish can develop so that future emissions of Greenhouse Gas emissions (GHGe) are reduced. One aim is to reduce GHGe within the parish by eliminating emissions of carbon dioxide from burning fossil fuels, by reducing demand for space heating and replacing fossil fuels with renewable and low carbon energy for electricity and heat. This ethos is supported by the NPPF 2021 in paragraph 152²⁹.
4. Improvements to insulation are encouraged by Policies DC1 and 2 as better insulated properties can have a significant lower requirement for space heating. There is also scope to convert the space heating source from fossil fuels to low carbon and renewable sources of heat, which can be particularly applicable for rural properties where the isolated location can provide greater capacity for ground and air source heat and for solar thermal.
5. The design stage of a home is a key stage for ensuring it is built right, with the dwelling being likely to stand for hundreds of years once built. It therefore makes sense to design all new homes to minimise lifetime emissions right from the beginning. This is necessary to meet our national carbon budget targets over the coming decade³⁰ and to be compliant with our objectives of being nationally

²⁹ NPPF (para152) "The planning system should support the transition to a low carbon future.....It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."

³⁰ <https://www.theccc.org.uk/publication/the-fifth-carbon-budget-the-next-step-towards-a-low-carbon-economy/>

net zero by 2050 and locally carbon neutral by 2040. Unfortunately, it is not always possible to match this target due to the rate of house-building required by government to meet housing needs, and current building regulations Part L falling short of net-zero emissions. However, where economic viability of new housing allows it makes sense to focus on raising standards where possible, adjusting our ambitions upwards and build houses that will not have to be upgraded again to meet the net-zero target.

6. The Future Homes Consultation³¹ published technical standards for proposed improvements to Part L of the building regulations. The accompanying impact assessment calculated the uplift in cost per dwelling that the 20% uplift would incur, which are reproduced below in Figure 24.

Type of House	Part L 2020 Option 1 (20% uplift)
Detached house	£4,200
Semi-detached house	£2,560
Mid-Terraced house	£2,200
Flats	£2,070
Average (based on build mix)	£2,870

Figure 24: Additional Capital Costs table

7. A viability note³² (Appendix 27) has been produced as evidence that this additional cost uplift can easily be accommodated, given the higher market values being achieved within the parish compared to the Cranbrook DPD, which advocates an uplift in Building Regulation requirements. This evidence shows that movement towards a more energy efficient house is viable.

8. In the event that the existing Building Regulations is superseded in future, the policy requires applicants to apply the energy hierarchy, which advocates a “fabric first” approach before considering on-site renewable generation or off-site contributions. The second part of Policy DC1 provides support for PassivHaus construction. Where this takes place, the following conditions should be met:

- *Submission of the full PassivHaus or a similar standard in terms of space heating requirements, ventilation and air changes is required to demonstrate that the specific standard can be achieved.*
- *Prior to commencement a ‘pre-construction compliance check’ completed by a PassivHaus or equivalent certifier will be required and secured by condition.*
- *Upon completion a Quality Approved PassivHaus or equivalent certification for each dwelling will be required.*

9. Policy DC1 and DC2 will help to reduce energy bills through energy efficient new homes and improving energy efficiency of existing homes.³³ Energy costs have been rising faster than inflation.³⁴ Fuel poverty is a significant problem in our parish which has hundreds of old houses, often detached

³¹<https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings>

³² Appendix 27 Viability Note.

³³ NPPF policy 154 (b) and 11a <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

³⁴<https://www.theguardian.com/society/2018/jun/26/rising-energy-prices-expected-to-worsen-uk-fuel-poverty>

or semi-detached, with poor insulation.³⁵ Better insulation and more efficient space heating can also improve the quality of life and living conditions, by reducing damp and cold home interiors, and draughts. Figure 25 shows that PV roofing materials have advanced and are less visually intrusive, which will be an asset for improving energy efficiency of existing homes. Development proposals should respond positively to the energy hierarchy as set out below:

1. Minimising energy requirements

Implementation of the following highly energy-efficient designs to increase the building's resilience to climate change is supported unless causing unacceptable loss of aesthetic or conservation value.

- The use of high quality, thermally efficient building materials.
- Designing buildings for efficient use of water, water management and cooling.
- The use of high-quality ventilation, such as high levels of airtightness, triple glazing, internal and external shading, mechanical ventilation heat recovery (MVHR) and passive cooling measures to allow the building to adapt to climate change, notably hotter summers, without increased energy demand for cooling, and to adapt to greater fluctuations in the weather.
- Improved insulation of the property as a whole, so that energy use for space heating per unit of volume is reduced.

2. Incorporating renewable energy generation.

One or more of the following innovative approaches which demonstrate sustainable use of resources and produce renewable energy will be encouraged until such time as it is required by legislation:

- Incorporation of on-site energy generation from renewable sources such as photo-voltaic and/or solar heating panels, solar shingles, and PV slates.
- Installation of ground-source and/or air-source heating.
- Linking to local renewable energy district heating schemes as specified in DC5.
- On-site batteries.
- Other low or zero carbon systems.

10. Neighbourhood planning offers communities the opportunity to develop a positive vision of their future. Pioneering towns, villages and neighbourhoods are already mapping out ambitious plans that will improve quality of life and make the transition to low carbon energy and transport at the same time. The climate change policies in this plan take appropriate account of the climate emergency declared by Devon County Council in 2019³⁶, which forms a material consideration for the purposes of neighbourhood plan policy. Policy DC2 promotes the generation of renewable energy, either on the premises or considering other low carbon renewable energy options. As new houses are likely to be only a small proportion of housing stock in the Parish, it is important to support the retrofitting existing buildings in moving towards renewable energy systems and sources, also known as 'retrofitting'.

³⁵ EDDC Local Plan 17.3 "...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 from new and existing development through improved efficiency measures."

³⁶ www.devonclimateemergency.org.uk

11. Where necessary, proposals should be designed to reduce any potential impacts on the character of buildings. These measures could include analysing the proportions of the building and roof surface in order to identify the best location and sizing of panels: concealing wiring and other necessary installations; the use of other tile or slate colours for compatibility with the solar panel materials; the use of proportionate contrast and boldness (for example, the use of black solar panels with black mounting systems and frames instead of blue panels); and positioning solar panels at ground level or on outbuildings including garages.



Figure 25: Examples of PV roofing materials now available.

Policy DC3: Sustainable Drainage

Intent Policy DC3

Policy DC3 seeks to promote exemplary sustainable drainage and water management practices across all new development.

Policy DC3: Sustainable Drainage

As appropriate to their scale, nature and location, new residential and commercial developments should demonstrate a net reduction in surface water runoff to minimise the impact of development upon the drainage regime of the parish's rivers, reduce incidents of localised flooding, and to maximise water storage and controlled release.

Sustainable drainage systems (SuDS) measures should also be designed to enhance the local environment and, as appropriate to their scale and nature, provide additional benefits including:

- 1. Water treatment and the removal of pollutants.**
- 2. Infiltration and groundwater replenishment.**
- 3. Recreation and amenity space provision.**
- 4. Biodiversity and habitat creation.**

Insofar as planning permission is required, proposals to retrofit, convert or extend existing properties should comply with the approach in this policy where it is both practicable and commercially viable to do so.

Justification Policy DC3

1. There are 3 rivers that run through Broadclyst Parish: the Clyst, the Cranny and the Culm. The extent of flooding within the area is presented in Figure 63. New development has the potential to increase flood risk through factors such as increasing hard surfaces and ground water flows,

overloading existing drainage and wastewater networks, or increasing the areas of existing flood risk. This policy was well supported by the community that is affected by flooding and recognises the need for infrastructure to minimise flooding throughout the parish.

2. Climatic changes are expected and predicted to affect local flood risk in several ways:

- Climate change is likely to result in wetter winters, with more rain falling in wet spells and increasing river flooding.
- More intense rainfall causes more surface runoff, increasing localised flooding and erosion.
- In turn, this may increase pressure on drains, sewers, and water quality.
- Rising sea or river levels may increase local flood risk inland or away from major rivers because of interactions with drains, sewers, and smaller watercourses. Impacts are likely to depend on local conditions and vulnerability.

3. Policy DC3 encourages effective drainage systems that contribute to the sustainability of development and improve the places and spaces where people live, work, and play by balancing the different opportunities and climatic challenges that influence urban design and the development of communities.

4. The policy is supported by the Environment Agency, who promote working with natural processes as an effective and multi-beneficial way to alleviate flood risk, and this is highlighted in the policy. Use of DCC³⁷ natural flood management, artificial drainage systems (SuDS), and water recycling features, including those listed below, are supported and encouraged.

- Permeable paving, driveways, and parking areas.
- Water harvesting and water storage features.
- Green roofs.
- Swales (natural or man-made ditches usually grass covered with sloping sides.)
- Soakaways.
- Retention ponds.
- Filter strips and/or detention basins.
- Minimise amount of green space lost to hard surfacing.

5. SuDs in this policy mimic nature and typically manage rainfall close to where it falls. SuDs can be designed to:

- transport (convey) surface water,
- slow water run-off (attenuate) before it enters a water course,
- provide areas to store water in natural contours,
- soak (infiltrate) into the ground,
- evaporate from surface water,
- lose or transpire water from vegetation (evapotranspiration).

Such drainage systems in the policy are environmentally beneficial, causing minimal or no long-term detrimental change. They are regarded as a sequence of management practices, control structures and strategies designed to drain surface water efficiently and sustainably, whilst minimising pollution and managing the impact on water quality of local water bodies. Policy DC4 recognises the

³⁷ DCC :- <https://www.devon.gov.uk/floodriskmanagement/planning-and-development/suds-guidance/>, the CIRIA SuDS Manual (C753) -

valuable role SuDS can play in helping Broadclyst Parish positively address issues around climate change, flood risk, water quality and biodiversity.

6. The parish's vulnerability to flooding is not only influenced by the manner in which new developments are designed to manage surface water, but also by a responsibility for existing properties within the Plan area to minimise surface runoff and contribute positively to surface water management. This encouragement is included within the Policy DC3.

7. The clause: "minimise amount of green space lost to hard surfacing" is included in the policy, as the paving of areas is proven to exacerbate localised flooding. Although paving over one or two gardens may not seem to make a difference, the cumulative effect of several people in an area doing this can increase the risk of flooding significantly. The harm caused by paving is not limited just to flooding but can also result in pollution of local streams and rivers via sewer overflows and the washing of pollutants. This can cause damage to local wildlife habitat and the wider environment.

8. Furthermore, where gardens are replaced with hard impermeable surfaces, the cooling effects of evaporating groundwater can be lost and result in a rise in local temperatures (often referred to as the urban heat island effect). Therefore, the retention of existing gardens and permeable surfaces is a key measure in helping to ensure a flooding and climate change resilient locality, and for the protection of the health of our local aquatic ecosystems.

9. The resourcing of water on a local level is supported nationally and is seen in Safeguarding our Soils: A Strategy for England (2009)³⁸, which sets out a vision for soil use in England. Furthermore, the Water White Paper³⁹ sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

10. There is recognition that developments may struggle to increase the amount of surface water infiltrating into the ground, unless infiltration is a viable method for managing surface water within a site. Re-using rainwater can reduce the amount of rainfall draining to the surrounding sewers and watercourses, however, suitable restricted overflows should be designed to ensure that rainfall can be appropriately managed should the rainwater harvesting tanks be full before a rainfall event occurs. Such methods are supported and encouraged within the policy.

Policy DC4: Residential Storage

Intent Policy DC4

Policy DC4 seeks to promote a design-led approach to electric and non-electric cycle, and mobility-aid use and storage, and the storage of refuse and recycling (bins).

³⁸ DEFRA (2009) Safeguarding our Soils: A Strategy for England.

<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>

³⁹ DEFRA (2011) (Water for Life) The Water white Paper <https://www.gov.uk/government/publications/water-for-life>

Policy DC4. Residential Storage

New residential development should be designed to facilitate occupants to recycle and make greater use of low carbon and active travel.

The use of the following dedicated storage facility structures will be supported:

- facilities for waste and recycling, and
- secure and dry external storage to accommodate bicycles and/ or mobility aids.

The storage structures should be considered as part of the initial design process and be incorporated in a manner that would minimise their visual impact on the public realm and any potential obstruction of pedestrian and vehicular access routes.

Justification Policy DC4

1. In order to maximise people's enjoyment of their property and to ensure the long-term adaptability of residential units, it is essential that all new dwellings include dedicated storage areas. Without adequate storage space, people's belongings will take space away from the rooms of the home and limit their enjoyment of them. Such storage space is particularly important to dwellings intended for family or wheelchair user occupation.

2. Inadequate or poorly designed refuse and recycling storage areas can be detrimental to the enjoyment of individual properties, and the residential amenity and aesthetic quality of the wider area. Similarly, they can make the segregation of waste into refuse and recyclables problematic and difficult, ultimately discouraging good recycling practices amongst households. It is therefore critical that the manner in which refuse and recycling is stored and removed is taken into account at the outset of the development design process (see design examples in Figure 26). Care should be taken to ensure that the proposed arrangements are acceptable in terms of their capacity, location, design and appearance in order to minimise noise, smell and movement nuisance, and the impact on the street scene.

3. With the climate emergency agenda and alternative uses of transport being advocated, inadequate or poorly designed cycle and/ or mobility aid storage can be detrimental to choices individuals make. To promote sustainable transport as seen in NPPF (2021) section 9, and to widen transport choices and modes, the way cycle and mobility equipment is stored and accessed is critical (see Fig 25), and the capacity of storage should be considered at the outset of the development design process. The allocation for a minimum of 2 cycles per dwelling was set as an achievable goal that raises the profile of active travel and the use of bicycles and/ or electric bicycles. This is at a lower level than the Cranbrook Plan Policy CB20, which sets the bicycle storage at a ratio of 1 storage space per bedroom.



Figure 26: Examples of residential storage space.

4. As EDDC do not have garage design specifications, recommendation by DCC meant that the Exeter City Council design guidance, that provides dimensions to allow space in garages that encourage storage and access of cycles, was adopted. Storage facilities may be combined. Garages acceptable for parking and storage should have a minimum internal dimension of 3m x 6m per vehicle. Cycle storage should be provided for a minimum of two cycles per dwelling.

Renewable Energy

1. At present, Broadclyst Parish has some provision of renewable energy generation:

- There is a district heating system that is heating the new houses at Tithebarn.
- There are houses and buildings in the parish which have one or multiple of the following:
 - Roof based solar panels for heating water.
 - Roof based solar panels for the generation of electricity.
 - Air or ground source heat pumps
- The National Trust (NT) are using wood pellets to heat Killerton House.
- Some NT holiday lets have air source heating systems.
- There are solar farms in rural locations near Higher Burrowton and at Crannaford.

2. For houses, old and new, the aim of the NP is for development proposals to include renewable energy capability and to reduce reliance on carbon-based energy sources in order to mitigate against global warming. There are many ways in which Broadclyst Parish can develop so that future emissions of Greenhouse Gas emissions (GHGe) are reduced. One way GHGe can be reduced within the parish is by eliminating emissions of carbon dioxide from burning fossil fuels, by reducing demand for space heating, and by replacing fossil fuels with renewable and low carbon energy for electricity and heat⁴⁰.

⁴⁰ NPPF (policy 152) "The planning system should support the transition to a low carbon future.....It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise

3. The adopted Local Development Order (LDO) (EDDC 2020)⁴¹ for a district heating scheme will enable the providers to expand the network and lay additional pipes without the need to apply for planning permission. This means that any sites within the boundary of the LDO could have connections installed to the district heating without the need for planning permission provided it complies with the order.

4. The Broadclyst Parish is within the red line boundary shown on the LDO map (Figure 27) and will potentially benefit from the development rights. The district heating scheme is however not yet zero-carbon, as the heating source is mains gas. It is anticipated that a renewable energy supply will be connected to the system in the future to comply with the EDDC Climate Change Strategy to be carbon-zero by 2040. Only at the stage when the scheme is utilising a large percentage of renewable energy would developments benefit from connecting to it.

5. EDDC commissioned a report from the University of Exeter in 2016⁴², which compared the emissions from the district heating scheme compared with other scenarios. The report compared these emissions to emissions that would have been generated by heating in the absence of the district heat network, concluding:

“...when DECC’s declining grid emissions intensity factors are used little or no reduction is achieved. This highlights the importance for heat networks to plan strategies for further decarbonisation beyond gas CHP.” (p.31 of the report).

6. At that time, “further decarbonisation” was expected to be achieved by the deployment of biomass combustion, but this has not occurred. To help determine the best way forward, EDDC set out the terms of a “Cranbrook Heat Network Detailed Feasibility Study”⁴³, which was published in September 2019. The terms of the study were to review the feasibility of the following sources of heat:

- Solid biomass.
- Solar thermal.
- Ground source heat.
- Waste heat from proposed France-Alderney-Britain connector project.
- Heat offtake from proposed Energy from Waste plant at Hill Barton.
- Other heat sources (including Met Office supercomputer).

The study was awarded to a consultancy firm WSP, and their report was published in late September 2020⁴⁴. The carbon emissions and financial viability of these options are explored in some detail.

vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”

⁴¹ <https://eastdevon.gov.uk/planning/local-development-orders/district-heating-local-development-order/>

⁴² <https://eastdevon.gov.uk/media/2260200/heat-network-strategies-for-the-west-end-of-east-devon-final-draft-030117.pdf>

⁴³ Appendix 21 Cranbrook Heat Network Detailed Feasibility Study (2019)

⁴⁴ <https://eastdevon.gov.uk/papers/cabinet/300920bpcabinetcranbrookhndetailedfeasibilitystudy.pdf>
<https://eastdevon.gov.uk/papers/cabinet/300920bpcabinetcranbrookhndetailedfeasibilitystudy.pdf>

7. It is hoped that a renewable heat source/s will be connected to the district heating systems in the future to comply with the EDDC Climate Change Strategy to be carbon-zero by 2040. These sources could include heat from waste, waste heat from the supercomputer, waste heat from the FAB Interconnector, heat from solar thermal, and seasonally stored heat from the ground. However, unless the heat network is distributing heat from renewable sources, new dwellings should not be obliged to connect to it.

Policy DC5: District Heating Schemes

Intent Policy DC5

To support low carbon District Heating Schemes.

Policy DC5: District Heating Schemes (DHS)

Across the neighbourhood plan area, including but not limited to the LDO District Heating Area (Figure 27), proposals for new development that demonstrate they will produce less than 150kg of CO₂ per kWh from heating systems will be supported.

Development proposals for such schemes should be designed to ensure they do not have an unacceptable impact on the character and setting of the immediate locality; the amenities of local residents and the character of the natural environment and its biodiversity.

Justification Policy DC5

1. The government is committed to a net 100% reduction in national greenhouse gas emissions (GHGe) by 2050⁴⁵, and the community supports tougher targets set by EDDC for carbon neutrality by 2040. An essential part of the role of the parish in reducing GHGe will be to reduce fossil fuel gas dependency in the built-up area of Broadclyst Village, as well as the new houses at Westclyst and Tithebarn that are attached to, or are to be attached to, a gas local heating district scheme. Whilst gas generates less GHGe per unit of heat than oil or coal, there will have to be a transition away from gas, or at the very least an offsetting of gas emissions, for the GHGe targets to be met. This policy is designed to support the development of a variety of heating schemes across the parish which provide a specified heating provision. Proposals from industry and businesses utilising large buildings to connect excess energy generated by their facilities to district heating networks will also be strongly supported. Such energy recovery is supported by the DCC Waste Plan⁴⁶.

2. The setting of a target of 150kg of CO₂ per kWh of heat in the policy is to ensure that levels are below averages presently known which are: average energy fuel mix for a UK home in 2019 produced 233 grams of CO₂ equivalent per kWh of electricity and 184 grams per kWh of gas⁴⁷. The “less than 150” target figure set in the policy is strongly in support of the movement to zero carbon

⁴⁵ <https://www.theccc.org.uk/uk-action-on-climate-change/reaching-net-zero-in-the-uk/>

⁴⁶ <https://www.devon.gov.uk/planning/planning-policies/minerals-and-waste-policy/devon-waste-plan>

⁴⁷ See <https://bulb.co.uk/carbon-tracker/>

emissions set UK wide⁴⁸. This was a reduction of 83 grams for the higher electricity fuel mix and 34 grams for gas.

3. As well as the existing District Heating Scheme shown in Figure 27, there are several potentially suitable sites producing waste heat from industry that could be used as a low carbon source of heat for a district heating system in the Broadclyst Parish area. These are:

- Waste heat from proposed France-Alderney-Britain connector project.
- Heat offtake from proposed energy from waste plant at Hill Barton.
- Waste heat from Met Office supercomputer.
- Other industries and buildings that have waste heat e.g., distribution centres requiring refrigeration or cooling.

This shows the capacity of the area to provide for DHS and why the clause in the policy encourages such development.

4. The last clause in the policy is supported by DCC, who support the utilisation of any waste heat from the Hill Barton facility which would enhance the efficiency of energy recovered and the sustainability credentials of the plant. The Waste Plan⁴⁹ policies also support the use of waste heat energy from waste processes, specifically part 1(d) of Policy W2: Sustainable Waste Management and part(b) of Policy W6: energy and Recovery.

5. In consultations with both the community and statutory organisations, policy amendments were required. Community feedback focused on the existing DHS provision which has been unreliable with frequent interruptions in the power and heating supply to properties. There was also concern about locking homes into an inefficient poor-quality DHS with high carbon dioxide emissions, and that local DHSs should not be assumed to be beneficial. Requests were for text in the policy to safeguard parishioners, especially given that PassivHaus and other technologies are fast becoming more widespread. There were strong community views on the need for:

- Existing DHS providers to provide and to move to low and/or zero carbon energy inputs and have lower carbon emission levels.
- Ensuring that those houses in the LDO District Heating scheme are not financially disadvantaged by the DSHS monopoly.
- Support for new DHS or alternative schemes providing the same service which have low and/ or zero carbon energy inputs.

⁴⁸ <https://www.theccc.org.uk/uk-action-on-climate-change/reaching-net-zero-in-the-uk/>

⁴⁹ <https://www.devon.gov.uk/planning/planning-policies/minerals-and-waste-policy/devon-waste-plan>

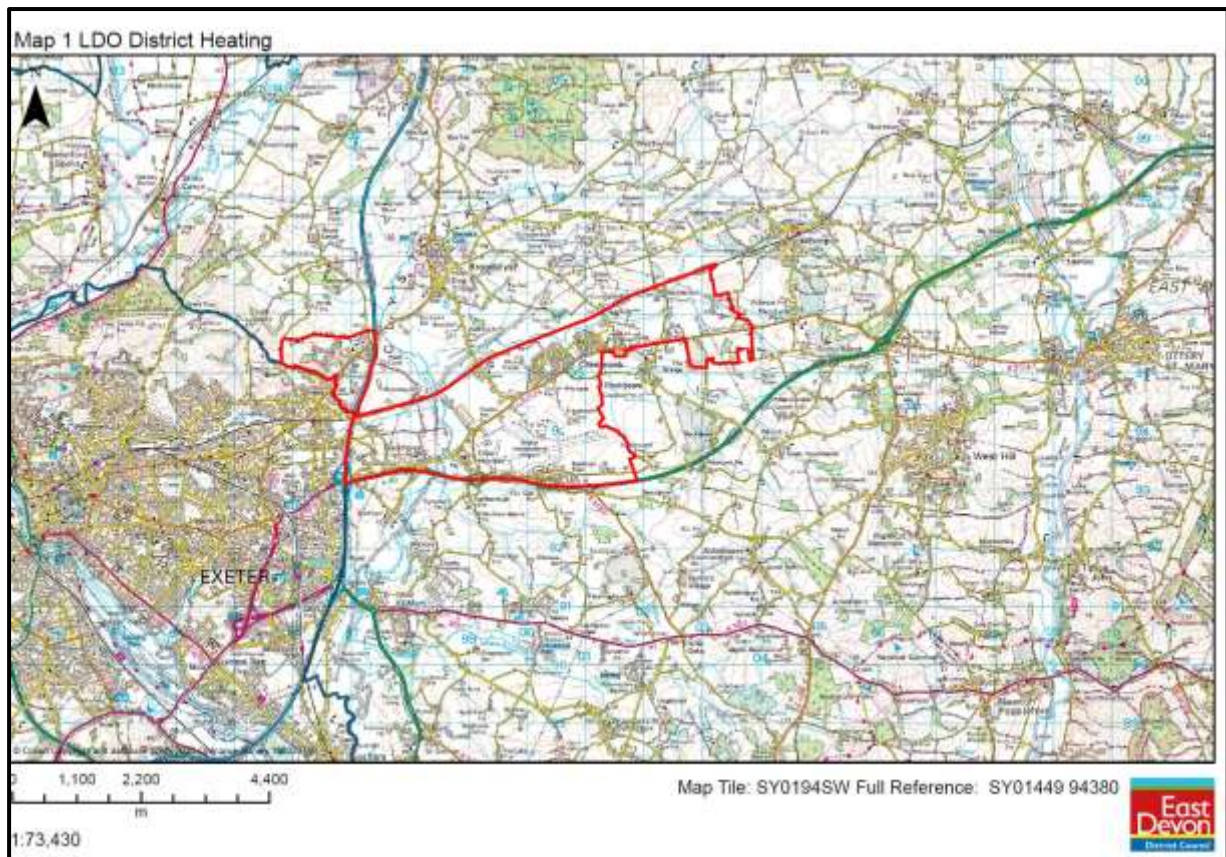


Figure 27: EDDC LDO District Heating Scheme Area.

Policy DC6: Community Led Renewable Energy Production

Intent Policy DC6

To support development of sustainable community scale renewable energy systems in the parish.

Policy DC6. Community Led Renewable Energy Production

Development proposals for renewable energy schemes which are promoted in partnership between a community organisation and a developer (commercial or non-profit) will be supported where they meet the following criteria:

- 1. The siting and scale of the proposed development is appropriate to its setting and position in the wider landscape.**
- 2. The proposed development does not create an unacceptable impact on the amenities of local residents (including noise, light, vibration, views and vistas, shadow flicker, water pollution, emissions) and the road network.**
- 3. Appropriate planting and landscaping in keeping with local landscape character is provided to mitigate landscape and visual impact, screening of the development and to protect important wildlife habitats.**
- 4. The proposed development safeguards and where practicable enhances water quality and aquatic life.**

Justification Policy DC6

1. The reliance on carbon-based energy is not compatible with the required outcomes for the climate change emergency, so this policy is in support of development proposals that generate energy by carbon-neutral means. National planning policy stresses the need for plans to provide a

positive strategy for renewable energy, to help increase its use and supply. Responding to climate change will require total transformation of how we supply and use energy, and a major increase in the number of renewable energy developments hosted in local communities.

2. Whereas Broadclyst Parish has been dependent on oil, gas, and electricity coming in from outside our area, we could improve resilience and our sense of self by re-balancing supply and demand in the energy sector: local energy generation can improve energy self-sufficiency⁵⁰. Policy DC6 sets out a policy giving support to a range of community small-scale renewable energy projects. Such policies aim to support the government in planning for its target of 100% reductions in GHGe by 2050⁵¹. We can also try to lead the way with steeper and deeper reductions, with a possible target of carbon neutrality by 2040 or even earlier⁵².

3. It is in the rural countryside that enormous potential for low and zero-carbon energy solutions reside. Land-based businesses can make a substantial contribution to the mitigation of climate change by supplying renewable energy, extracting energy from agricultural and forestry co-products, harnessing hydro power, and growing specialist crops for fuel.

4. Although not specified in the policy, it was noted that such district heating schemes are supported where they do not form 'excluded development' which may fall within section 61(k) of the Town and Country Planning Act 1990.⁵³

5. With the National Trust (NT) properties being converted to use air source heating in their properties, there was support for the policy and for such systems being adopted more widely across the parish. The use of ground heat source was similarly supported by the NT as a system for generating energy.

⁵⁰ NPPF 2021 Para 155 (c) <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁵¹ <https://www.bbc.co.uk/news/science-environment-45856377>

⁵² <https://neweconomics.org/2010/06/zero-carbon-britain-2030>

⁵³ <https://www.legislation.gov.uk/ukpga/1990/8/section/61K?timeline=false>

3. Economy and Employment

Introduction and justification for policies

1. The Broadclyst Parish NP wanted to promote economic development across the parish. This section is to justify the need to provide new economic sites and mixed development sites across the parish, and to support specific economic growth and opportunities. After each policy is a justification section that explains the reasoning behind selection and details on amendments made to site specifications.

2. Broadclyst Parish is a commuter settlement for Exeter, with commuting by car being the predominant travel choice. This choice has resulted in road capacity and safety issues. With the construction of 5000 new houses in the parish through the EDDC Local Plan Strategic housing development⁵⁴ and new economic land (Strategy 1,2,9,12, 13,14,16.) as shown in Figure 28, the existing road networks are struggling to cope with movements in and out of Exeter and north to south across the Parish.

3. The Shared Economic Strategy 2017-2020⁵⁵ recognises within its list of threats and weaknesses that rural communities, such as Broadclyst Parish, are becoming more dormitory, increasing commuting and loss of sustainability. EDDC⁵⁶ recognised the need to balance economic growth, with the need to manage adverse effects on the local roads when discussing the vitality of the Science Park in driving economic development.

4. The loss of sustainability and economic spaces and businesses is evident within the parish. This is not helped by the draw of Exeter being the second fastest growing city by population and the 3000 jobs increase in Exeter, a 5.1% increase on the previous year noted in the Centre for Cities Outlook Report⁵⁷ in 2018. Exeter's attraction for workers is shown in the EDDC Dec 2019 Employment Land. Review⁵⁸ data and from the 2011 Census⁵⁹, which reported 12,500 people travelling into the District for jobs, but 18,405 East Devon residents travelling out of the District for jobs, the majority (11,430) going into Exeter.

⁵⁴ East Devon Local Plan 2013-2031 <https://eastdevon.gov.uk/planning/planning-policy/> Available at <https://democracy.eastdevon.gov.uk/documents/s7652/ELR%20to%20year%20end%2031%20March%202019%20-%20committee%20report.pdf>.

⁵⁵ Shared Economic Strategy 2017-2020 Exeter and Heart of Devon Economic Partnership Nov 2016 Version 1.1

⁵⁶ EDDC November 29th, 2017 Cabinet Item 122 Available at <https://democracy.eastdevon.gov.uk/Data/Cabinet/20171129/Minutes/291117-Cabinet-mins.pdf>.

⁵⁷ Centre for Cities Outlook Report 2018 <https://www.centreforcities.org/> Available at <https://www.centreforcities.org/publication/cities-outlook-2018/>

⁵⁸ <https://democracy.eastdevon.gov.uk/ieListDocuments.aspx?CId=154&MIId=1348>

⁵⁹ <https://www.nomisweb.co.uk/census/2011/WU03UK/chart/1132462159>

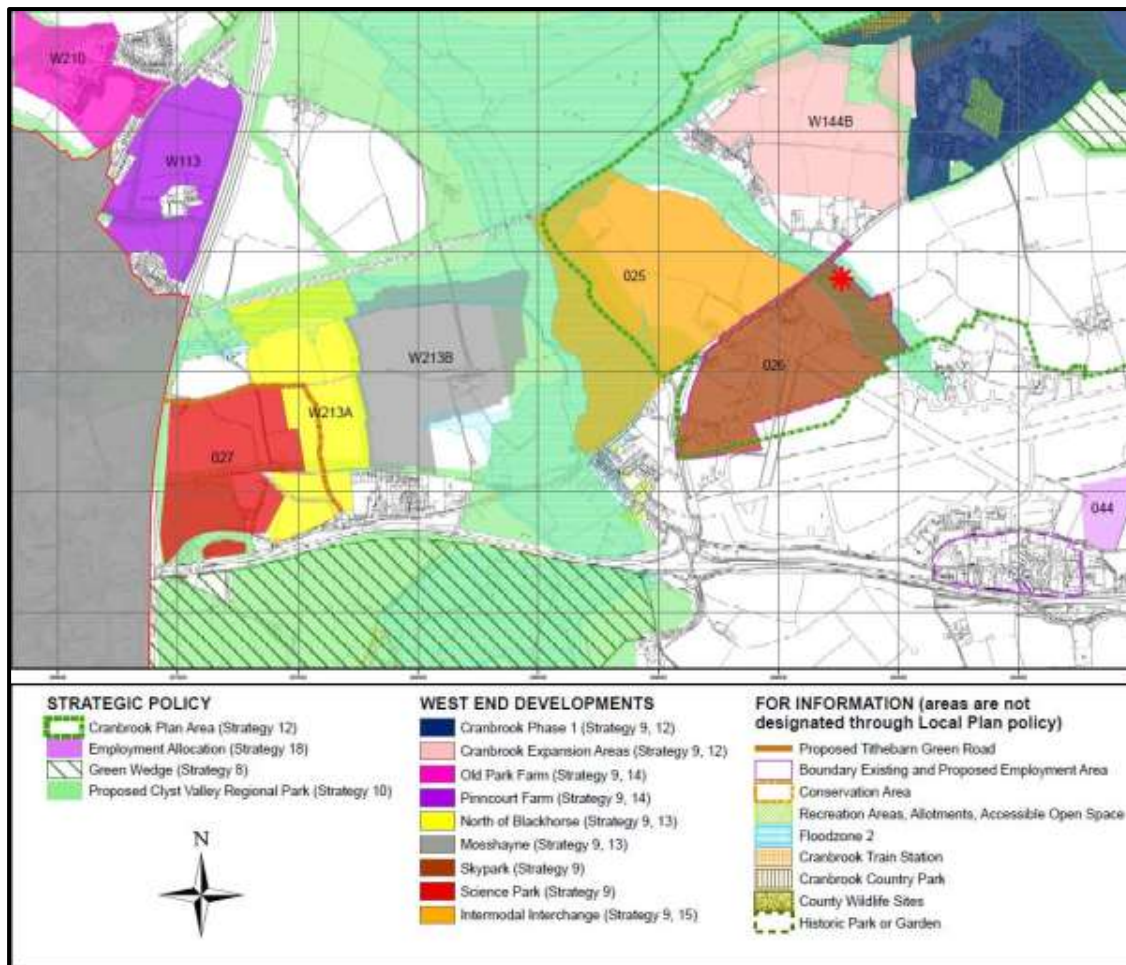


Figure 28: Extract from EDDC EDLP West End Insert Map showing Broadclyst Parish Economic site 027 (Full scale version at: <https://eastdevon.gov.uk/planning/planning-policy/local-plan-2013-2031/>)

5. Historically Broadclyst Parish was a rural parish where the main employment was farming, cider making and businesses supporting the rural population. Killerton Estate and Silverton Paper Mill were major employers. Figure 29, from the Broadclyst newsletter (the Broadsheet)⁶⁰ shows how many businesses thrived in the main settlement village of Broadclyst Village in the past.

⁶⁰<https://www.broadclyst.org/parishcouncil/broadsheet/downloadfile?path=38%2BBroadsheet%2BSpring%2B2018.pdf>.

Broadclyst Businesses in the 20th Century

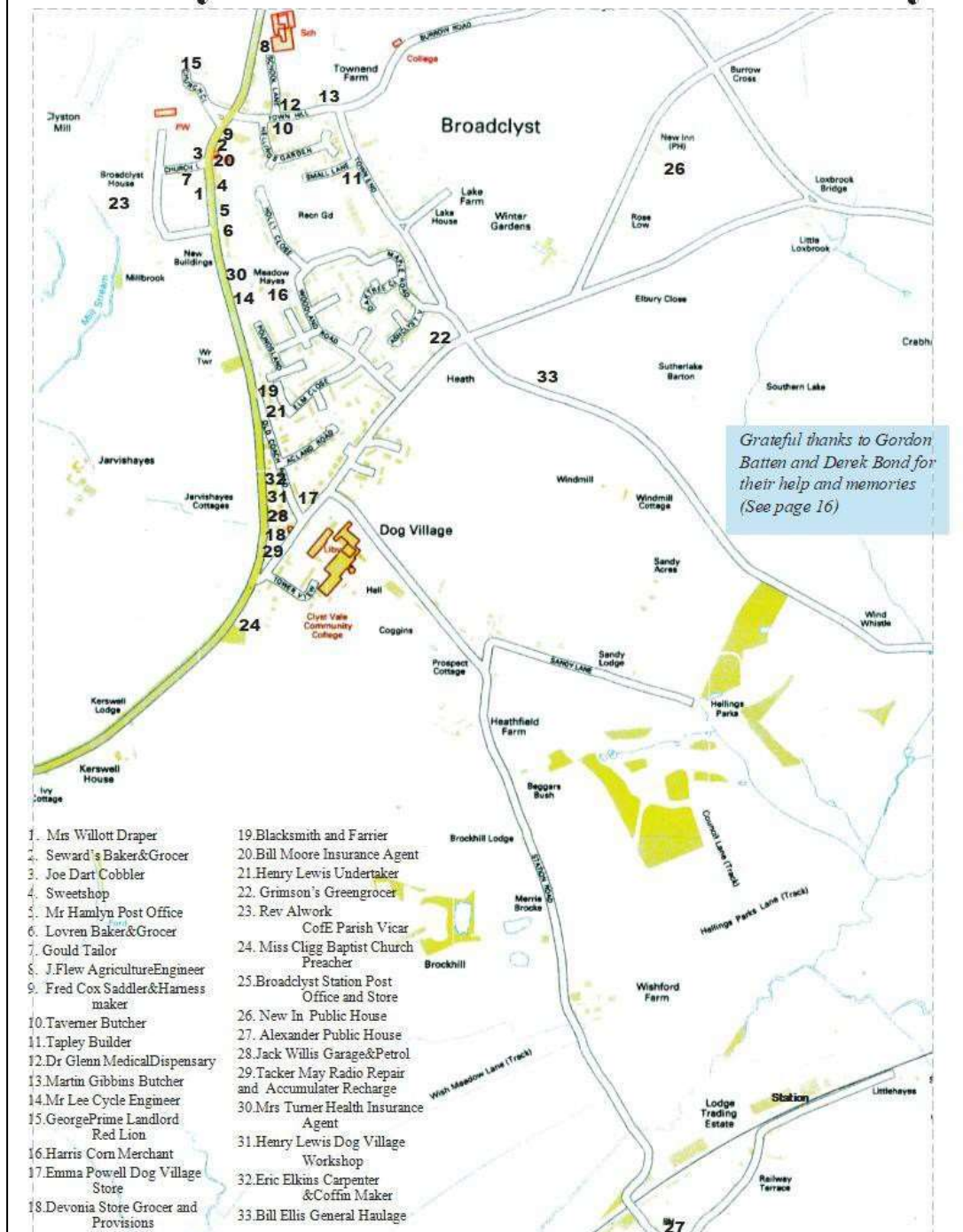


Figure 29: Abstract from the Spring 2018 edition of the Broadclyst newsletter by P. Peeper and J Ferrier, Broadclyst Publications.

6. A survey in 2018, of businesses in the parish, by the Economic NP Steering Group, revealed that businesses in the parish fell into the five business classes at the time of research. The business class use was updated in 2020 and such changes are presented in blue. The change of uses does not devalue what the research revealed on the spread and type of businesses that lie within the parish.

D1 Non-Residential Institutions 2020 legislation D1 is now split and replaced by new classes E e-f and F1- clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than

for sale or hire), halls, places of worship, church halls, non-residential education, and training centres.

A1 Shops - (New Class E a,b,c) shops, retail warehouses, hairdressers, post offices, pet shops, hire shops.

A4 Drinking Establishments - public houses, wine bars or other drinking establishments (but not night clubs) including drinking establishments with expanded food provision. (Sui Generis)

B1 Business – 2020 legislation B1 new Class E(g) uses which can be carried out in a residential area without detriment to its amenity. This class is formed of three parts:

B1(a) Offices - Other than a use within Class A2 (see above)

B1(b) Research and development of products or processes

B1(c) Industrial processes.

7. Other business types do exist within the parish, but there are only a few in each business class, for example, there are two C2 Residential institutions - Haylodge and Gracey Court are residential care homes/ nursing homes. Killerton Estate provides a range of businesses to include Killerton House & Gardens, catering, holiday lets and farms, not all of which come under a specified business class.

8. A lot of businesses are scattered around the parish, but there are specific economic sites such as the new Science Park (EDLP (2013-2031 Strategy 9)), Lodge Trading Estate, Beare Trading Estate, Hungry Fox Estate (see Figure 30), all of which offer a range of class B businesses.

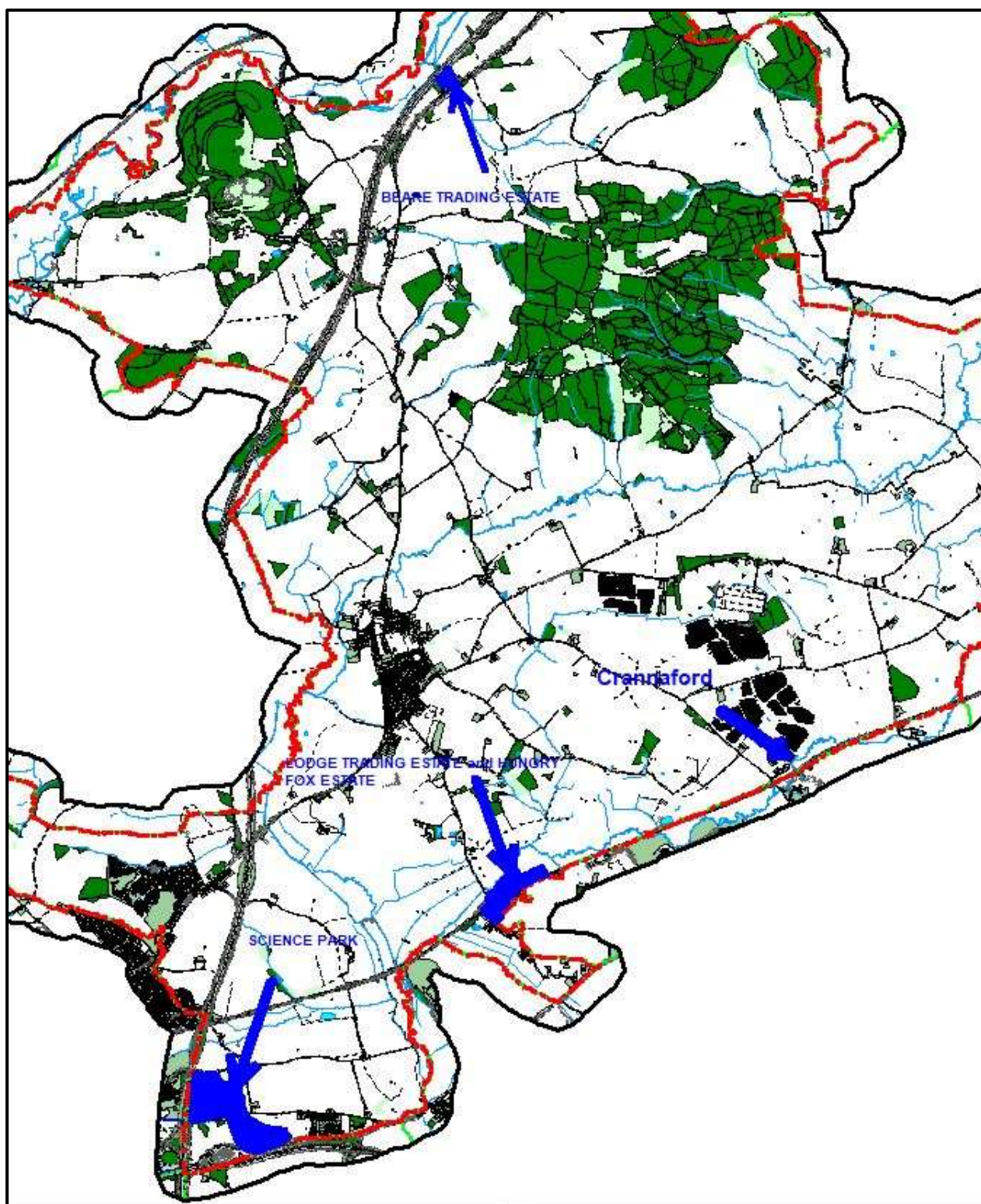


Figure 30: Economic sites across the parish (main economic sites in Blue)

9. Most of the Parish businesses fall within the category of small and medium-sized enterprises (SMEs) which have fewer than 250 persons employed; SME's are further subdivided into:

- **Micro-enterprises:** fewer than 10 persons employed;
- **Small enterprises:** 10 – 49 persons employed;
- **Medium-sized enterprises:** 50 to 249 persons employed.

The largest enterprises within the parish are the National Trust and the three schools, which fulfil the medium size enterprise category.

10. There are very few businesses that employ 10 – 49 people (small businesses), with the majority of enterprises being micro-enterprises. Figure 31 reveals the structure of East Devon's enterprise sector, which groups the size of site and types of enterprise that flourish within East Devon, and Broadclyst Parish duplicates this business size profile.

Business Sector	Percentage
Micro-enterprises (0-9 employees)	89%
Small-enterprises (10 – 49 employees)	9.6%
Medium- enterprises (50 – 249 employees)	1.1%
Large- Enterprises (250+ employees)	0.2%

Figure 31: SME breakdown for East Devon (Shared Economic Strategy for Exeter and the Heart of East Devon 2017⁶¹)

Steering Group Economic priorities for the Broadclyst Neighbourhood Plan.

1. Support for less commuting to work and to provide more employment within the Parish.

2. Regeneration of sites for business or mixed development

- Of old economic sites.
- Of old buildings.

3. Support for:

- new business provision across the parish
- small and medium (small/medium) businesses.
- for small/medium start-up businesses.
- for work hubs and work live units.
- for local food/ drink production businesses.
- an increase in provision of holiday accommodation.
- an increase of tourism related businesses.
- rural diversification businesses on farms.

4. Support for new and improved information technology provision and coverage across the parish.

Figure 32: Economic Steering Group Priorities for the Broadclyst Neighbourhood Plan

⁶¹ <https://committees.exeter.gov.uk/ieDecisionDetails.aspx?Id=1589>

11. The Economy NP Steering Group research was critical in developing a picture of businesses within the parish, as there were no questions in the Community Survey 2016 to provide guidelines for their work. The Economic Steering Group compiled a list of economic priorities which are presented in Figure 32. These priorities were used to establish the aims and objectives for economic growth in the parish and for the Economy and Employment Chapter. The aims and objectives were well received at the community consultations held on the Broadclyst “Fun Day” and were supported at Regulation 14.

Site Submission and Selection

1. The number of sites put forward by landowners in a Call for Land and how they progressed through the NP process is presented in detail in Appendix 19, with key criteria and stages in the process below.
2. All landowners submitting sites in the NP were sent the Economic Steering Group priorities for business growth. All economic and mixed development sites put forward in the Call for Land had to demonstrate how their site would achieve one or more of the economic priorities in Figure 31 in order to progress into the NP sites public consultation events.
3. A Marketability Report (Appendix 21) on the suitability for commercial uses of sites in Broadclyst Parish was written by Stratton Creber Commercial⁶². This was commissioned to appraise identified sites for their suitability for commercial uses that have support in the local community, meaning certain uses were therefore not considered. The site appraisals were undertaken from a marketing perspective with little account taken for financial viability. Specific business classes were ranked for suitability. The report was shared with landowners to inform them of the business class options for their site/sites.
4. The mixed sites were assessed by AECOM and this process is provided in Appendix 18. This assessment did not provide details on the business class options for the sites, but provided details as to the suitability of the site to bring forward mixed development.
5. At the Community Consultation Events held in 2019, potential NP sites were presented for the community to vote and comment on. All the economic sites and mixed development sites that were supported by the community, with at least a 50% majority vote, are presented in Figure 33. This revealed that the community were strongly in support of bringing forward economic sites that closely corresponded to the Economic Steering Group priorities. Figure 33 also presents which Steering Group priorities are achieved for each site.

Sites receiving a positive majority vote by the community in consultation events	Type of site- Economic or Mixed Development	Business class use/ details in line with 2019 legislation (class uses were changed in 2020)	Economic Steering Group priorities (Figure 34)
Beare Farm	Economic	B1a offices. B1c food production.	1,2,3
Crannaford	Economic	B1c light industrial. D1 nursery. Garden centre and café. Children’s play park and café.	1,2,3

⁶² Stratton Creber Commercial Report Appendix 21

Sites receiving a positive majority vote by the community in consultation events	Type of site- Economic or Mixed Development	Business class use/ details in line with 2019 legislation (class uses were changed in 2020)	Economic Steering Group priorities (Figure 34)
Winter Gardens	Economic	B1a office. B1c small scale engineering, small machinery workshops.	1,2,3
Elbury Farm	Mixed Development	B1 use class 20000sq m. A1/ D2 visitor centre, café.	1,2,3
Silverton Mill	Mixed Development	B1 use class 20000sq m. D2 recreation centre. A1 café/visitor parking.	1,2,3

Figure 33: The breakdown of Sites providing economic development in the Broadclyst Parish NP

6. The sites of Elbury Farm and Silverton Mill were included in the submission of the NP in December 2021. In the Draft EDDC LCA (Appendix 35) feedback revealed that these sites needed further work to be carried out in order for these policies to be included in a submission document. The qualifying body made the decision in June 2022 to withdraw these sites from the present Neighbourhood Plan, with the agreement that further technical assessments and work would be required prior to these sites being submitted in a revised Broadclyst Neighbourhood Plan.

National and Local

1. At both national and local authority level there is support for economic development. Discussions at EDDC from 2017 onwards have referred to the importance of:

- Gaining employment land within the district.
- 'One job for every home' principle.
- Creating commercial space outside towns.
- Commercial spaces were as vitally important as community facilities, so both must be protected.

2. Ensuring a good supply of sites and premises is an essential element in building more sustainable rural economies and better paid employment. This provides support for rejuvenating redundant commercial spaces across the parish as well as creating new employment land outside Exeter, and to meet the need of 'one job for every new home' principle for the new houses in Old Park Farm, Pinncourt, Blackhorse/ Tithebarn (See Figure 28).

3. The East Devon Local Plan⁶³ and the NPPF 2021⁶⁴ support building a stronger, competitive economy and recognise that in the rural parts of the parish policies and decisions should enable a prosperous rural economy. In paragraph 85 of NPPF 2021 there is recognition that economic sites in rural locations may be found adjacent to or beyond existing settlements and communities, and in locations not well served by public transport if sites meet local business and community needs. This allows sites in the NP to be allocated in a variety of locations across the parish, some of which do not

⁶³ East Devon Local Plan 2013-2031 <https://eastdevon.gov.uk/planning/planning-policy/>

⁶⁴ NPPF 2021 <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

necessarily have to be well served by public transport. All economic sites fall under the descriptors within paragraph 85 of the NPPF.

Site Viability

1. The Scoping Opinion on Viability Report (2022) (Appendix 36) looked at the viability of the economic sites EC1-3. The content of this report is for feasibility assessment purposes, as economic viability is a material consideration in the establishment of planning policy and determination of planning applications. The NPPF (2021) considers development viability to be a central consideration in delivering sustainable development. It was therefore important to assess the economic sites to determine whether the Planning Authority's requirements for planning gain can be delivered as part of a financially viable development. This report provides details on the viability of all the allocated economic sites.

2. It is to be noted that to ensure viability the costs of any requirements likely to be applied to development, such as requirements for standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable. For the economic sites being allocated, key costs focused on building costs as well as infrastructure contributions proportionate to each site and, in the case of Beare Farm, heritage mitigation costs.

Allocated Economic Site Policies

The material provided so far in this chapter sets out the context for the community's support for economic growth, and the justification for the allocation of sites and policies supporting growth in employment. This material provides the evidenced need for the policies within this section of the chapter. After each policy or group of policies there is a further brief justification section.

Policy EC1: Regeneration of Beare Farm

1. Beare Farm was returned to the Killerton Estate and the farmland will continue to be used for agriculture by the Killerton Estate. The return of this farm allowed a reconsideration as to the use of this site's farmhouse and buildings. The site was submitted into the Neighbourhood Plan process as an economic site. (See Appendix 19)

2. The Economic and Overview Steering Groups agreed that this site could have multiple class uses and that, in order to benefit the community, a range of uses were to be included and explored. As this site will remain within the Killerton Estate, the uses were considered in relation to existing business uses that fall within the Killerton Estate.

3. The Stratton Creber report (Appendix 21) provided an economic weighted appraisal of 5 for B1(a) office use, 2 for retail B1(c) and a weighting of 3 for retail and A3 cafe. Mixed use consideration was summarised as,

"The site's good road frontage and the nature of the buildings would permit an attractive scheme incorporating several workshops/ office units with an element of retail sales or alternatively a number of retail units combined with a café to boost its appeal to visitors".

4. The Overview Steering Group, using local knowledge of the site and its location, the Stratton Creber report, the Killerton Estate businesses use suggestions, and the Economic Steering Group priorities for the site, decided the following options would be included in the Public Sites Consultation Event. The site information for this event is presented in Appendix 19b.

The Site E1 the options were:

1. Conversion office class B1 (a) or
2. B1 light industrial / workshop use B1 (c) or
3. A food preparation facility linked into the Killerton Estates wider local food production plans.

The inclusion of light industrial use, although scoring 2 on the Stratton Creber report, was considered to be in line with agricultural work already being undertaken by the Killerton Estate. It was also agreed that some of the modern barn building on this site would be suitable for such business class use.

5. At the sites consultation public support was strongly in favour of this site being regenerated for these economic uses. The Overview Steering Group decision for the Regulation 14 Draft was to allow maximum commercial options for the site and to take out the “or” clause.

Intent Policy EC1

To achieve regeneration of a Grade 2 farmhouse and its farm buildings through refurbishment and selective development to create enterprise space and parking.

Policy EC1: Regeneration of Beare Farm.

Site EC1 in Figure 34 shows the area of Beare Farmhouse and outbuildings to be regenerated to provide flexible commercial space for either one or a combination of the followings uses:

- **Offices (use class E(g)(i))**
- **Food and/ or drink production (use class E(g)(ii),**
- **Small light industrial workshops (use class E(g)(iii).**

Proposals for Class B2 and B8 uses will not be supported.

Development and conversion of Beare Farm buildings will be supported subject to the following site-specific requirements:

1. **The conversion of the listed house and outbuildings should be developed in accordance with the provision of Policy DH3, and new development should be in accordance with the provisions of Policy DH1.**
2. **An appropriate level of parking for the uses proposed is provided on the site;**
3. **Sustainable modes of transport are provided for to and from the site where practicable;**
4. **A safe vehicular access is provided onto the B3181 which safeguards the pedestrian access to the Beare bus stop.**



Figure 34: Policy EC1: Beare Farm alongside the B3181 at Beare (area for economic development in red).

Justification Policy EC1

1. At Regulation 14 there was community and statutory authority support for this road fronted site, currently providing a range of buildings, to be converted to provide more employment and businesses space. This site would extend local economic provision in close proximity to the Beare Trading Estate. The site closely links with the NP aims and in particular with the objective: *To support food and drink production businesses which link to the parish farming heritage.*
2. Issues raised by statutory authorities at consultations resulted in policy amendment to ensure that development of the site does not compromise the farmland and impact upon the adjacent heritage buildings. To ensure development does not compromise the ability of the wider agricultural landholding surrounding the site, the wider land holding should ideally be farmed in line with Killerton Estate objectives or their future equivalents.
3. At the sites consultation voting, the public support was strongly in favour (82%) of this site being regenerated for all the economic uses presented rather than selecting one. The Overview Steering Group decision was to accept several commercial options for the site and to take out the 'or' clause. This would offer the Killerton Estate flexibility around the development, which had been put forward as a food and drink production base or as a farm shop.
4. In the Stratton and Creber report, the combining of light industrial and B2 provided a low score on the weighted scale applied by Stratton and Creber. This scoring was low as the site is not appropriate for B2 development due to the listed buildings and size of the site. However, in house food and production for the Estate with an element of retail scored higher by Stratton and Creber the class use, and was deemed suitable for the site and was supported in consultations.
5. Concerns about the listed buildings and historic mitigation was raised at Regulation 14, so the inclusion of a site-specific point 1 was to ensure that development would be sensitive to the onsite heritage assets. Beare Farm site is also inalienable land owned by the National Trust. The Grade II listed buildings and the existing brick building on the site will be converted and developed by the National Trust, within the constraints posed by the National Trust statutory purpose as set out in the 1907 National Trust Act, which is to conserve places of historic interest or natural beauty which it holds for the benefit of the Nation.

The trust supports a plan-led system of land use planning and advocates development that is demonstrably sustainable when considered against all options. The National Trust also has a set of planning principles, and when proposing development on its own land, to meet justified needs, the Trust will use a sustainable construction approach:

- minimising resource use and generation of waste,
- being energy efficient,
- minimising or preventing all types of pollution and risk of flooding,
- safeguard important wildlife, landscapes and historic interests,
- respecting local/ regional distinctiveness,
- where practical supporting local sources for goods and services,
- encouraging community involvement and access

In 2021 the National Trust's Destination Estate Vision for Killerton was published⁶⁵. The purpose of this Plan is to set out spatially how the National Trust can successfully deliver its national Environmental Pledges⁶⁶ and the Destination Estate Vision for Killerton, whilst protecting and enhancing the Estate's significant natural, archaeological, built and cultural heritage features and its unique character and sense of place. Whilst the National Trust's environmental pledges provide a national response to the climate and nature crises, this Plan provides a 50-year vision for the Estate's landscape, boosting its ability to store carbon by improving and expanding habitats and creating areas rich in wildlife. Through creating a range of connected destinations and activities, the Estate looks to welcome a wide range of new and existing communities and find diverse ways for everyone to feel part of this place. Included in the Destination Estate Vision Plan, three commercial nodes are provided. These nodes will provide opportunities for commercial activities that relate to Estate activity including the processing of food and other produce grown on the Estate, along with adding value to farmed produce and craft products. The nodes at Beare Farm, The Old Forestry Yard, and Columbjohn Farm, will be delivered whilst protecting and enhancing the sites significant natural, archaeological, built, and cultural heritage features and its unique character and sense of place.

6. The Scoping Opinion on Viability Report 2022 (Appendix 36) examined the viability of Beare Farm. In the report and the appraisal model (Appendix 7 in Appendix 36), it was deemed that if the site were to be brought forward on a commercial basis, it is likely that the costs of developing for the intended uses would be greater than the commercial revenue gained from commercial occupiers, allowing for a reasonable level of profit that would be sought by a developer. However, it is recognised that the site and its owners, the National Trust, are in a unique position whereby the buildings form an under-utilised asset. There is therefore a value-added to any proposals brought forward by the National Trust that is not possible to reflect in the viability assessment. Use of the site to increase revenue from food grown on the Estate and/ or a limited area of the site were to be brought forward (the farmhouse and two of the barns along the road frontage) for office development, this may also be viable considering the inalienable status of the land and the Estate's aspirations and circumstance.

Policy EC2: Regeneration of Winter Gardens Site

1. Three Wintergarden plots were put forward in the NP process. A site for a Community Sports Hub (CSH W), an economic site (SC2) and a mixed development site (MU6). The Stratton Creber report provided an economic weighted appraisal of site SC2 as 5 for B1(c) and B2 with all other uses weighing 1 or 2. It was noted under D1 that inclusion of a rural veterinary practice could be a possibility.

2. The AECOM report looked at a 12.75 hectare site (MU6) and concluded

"Given its size, development at this site is likely to be more appropriate for consideration as strategic scale development through the Local Plan process rather than as an allocation through the Neighbourhood Plan."

The AECOM report did however note that,

"Part of the site could be partially considered for mixed use development on the southern field due to:

- *The site is easily accessible.*

⁶⁵ <https://storymaps.arcgis.com/collections/1c3140f253e0470db4de9a7ffa1eaaac>

⁶⁶ <https://www.nationaltrust.org.uk/features/tackling-climate-change-together>

- *The site is relatively flat.*
- *The site is in close proximity to community facilities and public transport links.”*

3. The Overview Steering Group, using local knowledge of the site and its location, Economic Steering Group recommendations for the site, and the Stratton Creber report, decided that only offices and light industrial uses would be put forward in the Public Sites Consultation Event. This decision was based on the current use of the site, size of vehicles, road access and because B2 use is provided elsewhere in the parish. The selection of uses is provided in more detail in Appendix 19. The site information for the public consultation event is presented in Appendix 19b.

4. Public support was strongly in favour of this site being regenerated for the selected economic uses and the Regulation 14 Draft policy was drafted.

Intent Policy EC2

To achieve regeneration of part of Winter Gardens farm buildings through refurbishment and new development to create enterprise space and parking.

Policy EC2. Regeneration of Winter Gardens Site

Figures 35 and 36 show the area of Winter Gardens to be regenerated to provide flexible commercial space for the following uses:

- **Offices (use class E(g)(i))**
- **Light industrial uses (use class E(g)(iii))**

Development proposals should satisfy the following criteria:

- 1. the redevelopment does not have an unacceptable impact on the character of the immediate area;**
- 2. the proposal would not unacceptably harm the amenity of neighbouring businesses and residents;**
- 3. the volume of traffic generated by proposals can be satisfactorily accommodated on the local highway network;**
- 4. sufficient parking is provided within the site;**
- 5. safe vehicular access can be provided; and**
- 6. appropriate landscaping is provided along the boundaries of the site.**

Proposals for class B2, B8, F1 and F2 uses are not supported.



Figure 35: Site EC2: location and access in relation to the Whimble Road.



Figure 36: Policy EC2: Winter Gardens site (economic development area in red).

Further Justification Policy EC2

1. At consultations, public support (65%) for EC2 was in favour for this site to become an employment site but issues were raised in relation to clarity of access. These were addressed in the Regulation 16 Draft by including an extra map showing more detail on location and access.
2. The development of the site for any of the uses will be an economic asset to the parish which meets the economic aims and allows an existing economic site to regenerate, in keeping with the needs and support of the community, and in line with site maintaining and encouraging agricultural/ rural based business.
3. The Stratton Creber report was heavily in support of general industrial uses, on the basis that existing buildings on this site are large agricultural barns, possibly reflecting why ranking for office-

based use was lower. The community were not in support of general industrial uses in a village location with a road infrastructure that is not designed for such use. Locations of general business uses locally exist along the B3131, but not in a village location. Business uses were selected by the Economic Steering Group to be those which would encourage an ongoing agricultural/ rural theme based on light industrial businesses and for office use by the immediate local community. The policy allows new build as well as conversion, and new office structure was deemed appropriate for such a village-based location. In public consultations, these uses were supported and fitted closely with the economic aims and objectives for the Plan, and are in keeping with the main employment sector as seen in the SME data for East Devon presented in Figure 31.

4. In the emerging new Local Plan, a site adjacent to EC2 was submitted in the HELAA process and the site for housing was rated 5 By EDDC as a:

“Good site, minor constraints or sensitivities and limited infrastructure costs.”

Further information in this assessment provided the comment:

“This large site to the east of the village, although not directly adjacent to the village has few sensitivities and is set on relatively flat land. It is considered to offer some potential for strategic-scale development.”

With a preferred approach to allocation comment:

“Yes- although at a reduced capacity of around 160 to allow for some employment uses.”

This allocation and particularly the reference to employment uses supports the allocation of EC2 as an employment site.

5. The Scoping Opinion on Viability Report (2022) (Appendix 36) looked at the viability of Winter Gardens. In the report and the appraisal model (Appendix 9 in Appendix 36) the viability of this site is the nature of what development is proposed and the phasing of development on the site, rather than the site not being able to deliver sustainable development. The appraisal reported that based on modelling carried out, and again assuming a refurbishment scheme rather than wholesale new build, an office development would provide the greatest return. A change of use within the existing buildings for light industrial uses, with a light touch refurbishment, generates a land value which could be marginally viable. It is likely that any change of use will be brought forward in a phased way, rather than wholesale redevelopment of the site, given the opportunity offered in the existing buildings.

6. The AECOM site options work and the SEA assessed the site for heritage assets with both authors confirming in their reports that site development would be unlikely to impact upon local heritage assets.

7. The development of this site is also in general conformity with EDLP (2013-2031) strategy 31, D7 agricultural buildings and development, D8 re-use of rural buildings outside settlements and E4 rural diversification.

Economic Generation Policies

Work hubs

Introduction and Justification EW1

1. Rapid developments in technology, rising transport costs and quality of life factors are fundamentally changing the way we work. There is a growing trend towards more flexible working, an approach that provides more freedom, greater choice, and greater productivity.

2. In Devon it is estimated that there are 85,000 home-based workers, many of whom would like to have the flexibility of shared office space to help combat isolation, along with the business support and collaborative energy that a work hub creates. Statistics in Figure 37 from the Office of National Statistics (ONS) show that the Southwest have high levels of homeworking and self-employment. This potential is supported by Workhubs Network⁶⁷, which examined low carbon workspace potential in rural areas.

Rural areas: strong workhubs potential	Urban UK		Rural UK	
	Homeworking as % of workforce	Self employed as % of workforce	Homeworking as % of workforce	Self employed as % of workforce
North East	9.29%	9.03%	13.6%	13.90%
North West	9.81%	10.94%	18.3%	19.43%
Yorkshire & Humberside	9.44%	10.94%	18.2%	17.58%
East Midlands	10.11%	10.17%	16.6%	15.57%
West Midlands	11.16%	11.33%	21.8%	19.17%
Eastern	12.04%	12.43%	18.2%	18.21%
London	13.53%	16.32%	N/A	N/A
South East	13.51%	12.84%	21.0%	20.28%
South West	12.59%	10.22%	21.4%	22.57%

Figure 37: ONS Labour Force Q4 (2009)

3. This is in line with information provided by the TUC⁶⁸ (2019), which provide the following information:

There are 374,000 more employees working from home than 10 years ago. In the UK 6% of the workforce worked from home in 2019. In the Southwest there are 188,000 homeworkers 8.1% which is the largest percentage across regions in the UK. The analysis reveals that:

- There has been a 27.7% increase in the number of homeworkers in the last decade.
- Around 4 million more UK workers say they would like to work from home for at least some of their working week but are not given the chance.
- For employers, homeworking makes recruitment easier, can increase productivity, and reduce premises costs.
- For workers, homeworking can save time and money on commutes, give more flexibility over working time, and make it easier for carers and parents doing the school run.

⁶⁷ Workhubs Network (2010) Workhubs: smart workspace for the low carbon economy.

⁶⁸ <https://www.tuc.org.uk/news/homeworking-more-quarter-last-decade-tuc-analysis-shows>

- Home working is also an important way for some disabled people to access the labour market. Around 200,000 disabled people currently work from home regularly, and the TUC believes that homeworking could play an even larger role in helping to close the employment gap with non-disabled workers.

4. Statistics from ONS 2019 compared homework location data from 2008 and 2018 (See Figure 38), and the Southwest showed a consistent pattern of homeworkers working in a separate location away from home:

- **Gender:** There are almost twice as many men as women homeworkers. But the number of female homeworkers is increasing, with a growth of 36% in ten years.
- **Homeowners:** Homeowners are 73% more likely to work at home than renters.
- **Age:** Older workers are more likely to work at home, with 7.4% of 40- 59-year-olds homeworking, but only 3.4% of 20-29-year olds.
- **Occupation:** 11.9% of managers work at home – more than any other group.
- **Region/nation:** The Southwest has the highest proportion of home workers in the country, with 1 in 12 people working from home. Northern Ireland has the lowest with just 1 in 32 employees working from home.
- **Disabled workers:** Homeworking can be an important way for disabled workers to access the labour market, with 230,000 disabled people working from home.

5. Chief Executive of Work Wise UK, the organiser of National Work from Home Day, Phil Flaxton said:

“Whilst it is encouraging to see a significant increase in the number of employees working from home there still needs to be a cultural shift for it to be accepted more widely.

Attitudes are changing on how we balance or mix work and lifestyle. Increasing mobility and technology is shifting the acceptance or need for traditional 9-5 work patterns, to be replaced by a more flexible approach to the working week and this trend will continue as more of us embrace new, smarter ways of working such as working from home.

More employers need to realise the tangible benefits of changing outdated working practices to reflect the connected world in which we live. These include, increased productivity, staff retention, less absenteeism and employee burnout. The business case is sound, and it really can be a win-win for all concerned.”

GOVTOF Government office regions - summary	HOME Whether mainly work from home (main job)							
	Own home	Same grounds or building	Different places with home as a base	Separate from home	Own home	Same grounds or building	Different places with home as a base	Separate from home
	'000s							
1 North East	19	5	93	1,030	39	8	73	1,097
2 North West	55	31	192	2,319	119	17	230	2,438
3 Merseyside	11	2	43	525	23	3	51	609
4 Yorkshire & Humberside	60	27	172	2,147	140	18	212	2,221
5 East Midlands	60	24	178	1,901	88	15	198	2,010
6 West Midlands	63	25	214	2,191	120	19	237	2,374
7 Eastern	102	23	281	2,415	160	22	251	2,671
8 London	136	11	302	3,379	233	14	416	3,993
9 South East	167	42	415	3,620	267	39	426	3,668
10 South West	107	45	250	2,146	154	47	309	2,298
11 Wales	32	32	127	1,157	64	29	103	1,324
12 Scotland	55	28	151	2,295	87	21	132	2,425
13 Northern Ireland	16	19	46	686	30	21	29	767
Total	884	314	2,464	25,811	1,542	272	2,667	28,095

Created on 02/05/19 by Office for National Statistics
<http://www.ons.gov.uk/>

Table oFigure 38: 2008 and 2018 ONS data on homeworking

6. Devon work hubs⁶⁹ is a growing community of friendly and flexible workspaces, perfect for home-based and mobile workers, business start-ups, freelancers, and entrepreneurs. To date there are 14 Devon work hubs, in which users share a workspace, exchange ideas and expertise, having interactions unavailable to those working alone at home or at café tables. Work hubs allow small businesses that started from spare rooms and kitchen tables an interim move as they provide inexpensive, flexible term office space, equipped with facilities that modern businesses need to grow and network, allowing collaboration alongside like-minded people, before they make the move into office accommodation and are tied down to a long-term contract.

What work hubs provide does differ, but the following is common provision:

Flexible desk space
Offices
Coffee

Meeting rooms
Wi-Fi
Printing

Onsite parking and cycle storage
Networking events
Postal address

⁶⁹ www.devonworkhubs.co.uk

7. Location of work hubs tend to be in or close to centres of population, however more rural locations are still successful, as seen in the illustration below from the Devon Hubs website of the Woodlands Work hub in South Molton (Fig 39). Another example of a rural work hub is seen in East Budleigh, which has been created in an old farmhouse.



Figure 39: Devon work hub showing building design, size, and layout.

8. The most populated area in the parish is Westclyst, but other locations, such as Crannaford and Silverton Mill, sit close to the populated areas of Cranbrook and Bradninch. These would be good locations for work hubs. There is community support for both new builds, as well as re-use of rural and agricultural buildings. With the prediction that 50% of the work force will be working remotely by 2020⁷⁰, the provision to hot desk and work remotely is necessary, especially in areas where home broad band provision is poor. Covid-19 in 2020 has highlighted the advantages and emergence of homeworking, with work hubs offering a rented space people can come and go from, which can be adjusted to Covid-19 working conditions.

9. Across all business sectors Small and Medium Enterprises (SMEs) comprise around 95% of businesses in the UK, providing significant employment opportunities. The areas of Westclyst, Crannaford and Silverton Mill are well suited to providing work hubs to serve the needs of SME business in the parish. In future Broadclyst Station will have Cranbrook Town on their doorstep, enabling such provision to flourish.

10. Broadclyst Parish has become a commuter parish to Exeter, and there is both a need and support for the development of work hubs. Work hubs being located in the Parish's more populated areas would help the community to move away from being a dormitory of Exeter, decrease commuting and improve sustainability.

⁷⁰ <https://www.hso.co.uk/leased-lines/technology-news/homeworking-news/50-of-uk-workforce-to-work-remotely-by-2020>

Policy EW1: Development of Work Hubs

Intent Policy EW1

To support the development of work hubs within the parish to enable a shared working space for residents.

Policy EW1. Development of Work Hubs

Development proposals for work hubs across the parish which enable the start-up and growth of micro-sized enterprises through the provision of small, 'hot desk', incubator offices and work hubs will be supported.

Development proposals for work hubs will be supported from:

- 1. Conversions of existing buildings.**
- 2. New builds.**
- 3. Farm diversification proposals that would deliver an additional income stream for the established ongoing agricultural business, and would not be a significant shift away from farming as the mainstay of the operation.**

Proposals will be supported where the developments are:

- in proximity to centres of population,**
- in proximity to sustainable travel options and**
- of a scale proportionate to the size and scope of the location.**

Development proposals within the wider rural area should not unacceptably impact on the landscape and heritage character of the neighbouring area. In addition, their detailed design should ensure that they do not unacceptably impact on neighbouring residential properties.

Development proposals for work hubs in the Clyst Valley Regional Park will not be supported other than where they positively contribute towards achieving the objectives of the Park.

Further Justification Policy EW1

1. The provision of work hubs was well received by both the community and statutory authorities who saw this as a flexible workspace which would provide working space for locals. Work hubs have flourished under Covid-19 conditions, especially those which are designed for a system that use a sign-in/ sign-out system for single users to utilise a set space. This offers a flexible workspace that is one step removed from working at home, but importantly one that is ergonomically set up for working, unlike most home working environments. It also encourages active travel as it is locals who access work hubs. The development of the Cyst Valley Trail⁷¹ could allow work hubs to be located along such active travel corridors within the parish, if developed within CVRP guidelines.

2. The development requirements in the policy were to ensure that the number and scale of work hubs would be proportionate to the size and scope of the parish. The number and scale would also allow such buildings to blend into a location and that, alongside the other policies within the Plan, this type of development would encourage new and conversion development to have sustainable construction and on-site energy production. In East Devon, existing work hubs are rurally located and this policy will be suited to development within the parish, especially in conversion of buildings close to the new communities of Cranbrook, Westcyst and Tithebarn.

⁷¹ <https://www.devon.gov.uk/haveyoursay/consultations/clyst-valley-trail/>

3. The number of work hubs would be limited in the parish as existing models provide evidence that these buildings are located close to settlements, communities and close to major roads, but there is only one “B” road within the Parish and three settlements of a size to support a work hub.

4. This policy is in conformity with EDDC E5, which supports small scale economic development in rural areas in line with three key headings. It is also in line with the biggest economic work profile in East Devon (Figure 30), which matches the size of site and the types of enterprise that flourishes within the East Devon.

Tourism

Introduction (ET1 and ET2)

1. Broadclyst has long been regarded as a popular visitor destination attracting around 300,000 visitors per annum. The main attraction is the Killerton Estate owned by the National Trust (NT) which includes historic buildings, 6,400 acres of land, 250 cottages and 18 farms. The Association of Leading Visitor Attractions ranked Killerton as the 121st visitor attraction in GB and noted 7 % increase in visitor numbers to 267,383 in 2018.⁷² These statistics do not include those visiting the other NT properties, such as Markers and Clyston Mill, and the various informal countryside and woodland sites within the parish. Another attraction is Ashclyst Forest and Danes Wood, both on the Killerton Estate. Ashclyst Forest is one of the largest woods and a known haven for butterflies, bluebells and birds, with waymarked trails for exploring the wood and surrounding countryside.

2. Visitor accommodation is very limited and does not cater for all sectors of the holiday market. There are no public camping and caravan sites or hotels, and very few bed and breakfast establishments, Airbnb, and self-catering holiday cottages. The total accommodation provision is of 8-12 properties within the parish. Tourism accommodation needs to offer a range of styles, types, and qualities and to make use of redevelopment or conversion to extend this provision.

3. The community recognises the contribution tourism makes to the local economy and is keen to promote an increase in visitor numbers and accommodation, particularly outside the main holiday season, but reflects that growth must be balanced against protection of the very features and attractions which appeal to visitors. The Shared Economic Strategy by EHOD (2016)⁷³ supports the communities view on the role of tourism stating,

“Leisure and Tourism is unlikely to reduce the productivity gap or develop the knowledge economy but contributes significantly to the quality of life for people in the EHOD area. This will play a strong role in encouraging skilled workers to stay in the area, and to relocate to EHOD from outside the area.”

4. Both the NPPF (2021) and the EDLP (2013 - 2031) are both in support of a prosperous rural economy which enables sustainable rural tourism and leisure developments which respect the character of the countryside.

5. The Steering Group’s research provided the following aims for tourism development across the parish:

- To protect and enhance the features of the parish that contribute to the holiday offer of Broadclyst Parish.

⁷² ALVA: <https://www.alva.org.uk/>

⁷³ <https://eastdevon.gov.uk/business-and-investment/business-and-investment-information/exeter-heart-of-devon-shared-economic-strategy-2017-20/>

- To support new sustainable tourism developments which will extend, complement, and enhance tourism.
- To increase the range of styles, types, and capacity of tourist accommodation and to enhance the existing tourism accommodation.

6. Small scale tourism development, which is appropriate to the overall character of Broadclyst, will benefit the local economy but this must be balanced against the need to protect the rural landscape which contribute significantly to the character and qualities of parish and its existing tourism offer. The EDLP (2013- 2031) strategy 33 and more specifically E16, E18, E19 and E20 support the following policies.

Policy ET1: Development of Tourism.

Intent Policy ET1

To promote and support an expansion and improvement of tourism within the parish.

Policy ET1. Development of Tourism

Development proposals for sustainable tourism will be supported subject to the following criteria:

- the scale of the development reflects the rural nature of the parish;
- the proposed development should respect the landscape and heritage character of the immediate locality and where necessary incorporate appropriate landscaping and visual screening;
- the proposed development does not have an unacceptable impact on the amenities of residential properties in the immediate locality; and
- the proposal can be safely accommodated in the local highway network and provide appropriate levels of car parking.

Development proposals for tourism in the Clyst Valley Regional Park will not be supported other than where they positively contribute towards achieving the objectives of the Park.

Policy ET2: Holiday Accommodation

Intent Policy ET2

Policy ET2 is to increase the range and quality of holiday accommodation available in the parish.

Policy ET2. Holiday Accommodation

Development proposals for holiday accommodation will be supported which are:

- in close proximity of existing buildings and/ or settlements;
- of a scale and height that is proportionate to existing buildings in the immediate locality;
- for holiday purpose only;
- are able to demonstrate that such development proposals should not unacceptably impact on the landscape and heritage character;
- are designed to ensure that the sites do not adversely impact the immediate neighbours and the wider setting; and
- designed to ensure that traffic, access, and highway matters are satisfactorily addressed.

Development proposals for holiday accommodation in the Clyst Valley Regional Park will not be supported other than where they positively contribute towards achieving the objectives of the Park.

Justification Policies ET1 and ET2

1. Public consultation resulted in all economic tourism policies being very well supported by the community, but the recommendations by the planning authority was to ensure a careful check of the wording and interpretation and unintended implications. The Overview Steering Group recognised that all these policies (ET1 -3) had to be more restrictive and specific to avoid unintended development. The following changes were applied to these policies.

- Restriction on the number and type of provision.
- Include more site-specific requirements.
- Include a section on development in CVRP.

These changes ensured that the policy was less open to interpretation, specified a set number of developments and added design consideration which would further limit potential development sites.

2. The Parish Council considers that tourism sits well with the Plan's wider approach to sustainability, and that the tourism provision in the parish could usefully be extended to include a climate change focus. This would enable the development of tourism to be in keeping with the parish landscape and heritage settings. The Parish Council would particularly support tourism proposals relating to:

- woodland;
- flora and fauna habitats;
- rural crafts (including traditional rural crafts);
- climate change, and;
- heritage (natural and built landscapes).

For clarity, sustainable tourism proposals are those which contribute to the conservation and enhancement of the natural environment whilst providing for the needs of users and bringing benefits to the local economy and avoid unacceptable impacts on the local environment.

3. Policy ET1 is providing tourism that promotes a year-round industry that can be used regularly by locals as well as visitors into the parish. It will build on the visitor numbers already utilising the Killerton Estate as the policies extends the present tourism offer, highlighting new landscape and heritage experiences.

4. Policy ET1 is providing a template for tourism development that works with the natural assets of the parish and is in line with EDLP (2013-2031) strategy 33 which supports sustainable tourism and tourism that responds to visitor demands. Community consultations involved the community in considering areas of the parish that could extend the existing tourism. This feedback and the work of the Economic Steering Group resulted in the following ideas to expand tourism in the parish:

- A gateway centre to facilitate use of Ashclyst Forest for walkers, cyclists, and horse riders.
- A centre offering visitors insight into traditional rural crafts and skills e.g. production and history of cider making in the parish.
- A centre covering education on biodiversity, wildlife habitats and climate change issues.
- A centre providing tree based high rope and tree top experiences.

ET1 was designed to facilitate all of these tourism ideas coming forward under this policy and ET2 was designed to provide accommodation for a growing tourism industry.

5. In policy ET2 the development restrictions were set so the potential number and scale of holiday units across the parish were felt to be proportionate to the size and scope of the Parish. In order to support the sustainable tourism development provision in ET1, it is appropriate that the parish is

providing an increased capacity for visitors wishing to visit several of the visitor attractions and to be able to stay locally. The environmental sustainability of such an offering is very much in line with carbon footprint policies within the Plan.

6. The strength of policy ET2 is that not all provision is going to be new build on greenfield sites, but instead a mix of building conversion and this is in general conformity of EDLP (2013-2031) E4 and E16.

Development of Touring Caravanning and Camping Sites

1. There is one campsite called Caddihoe in the Broadclyst Parish. The site is on the edge of Ashclyst Forest which is part of the Killerton Estate. The site lends itself to the basics camping, but still with the provision of safe drinking water from a tap, some flushing toilets and 1 cold shower. The site, as shown in the photograph, is loaned to Devon Scouts who run it, maintain it, and take bookings. The Caddihoe bookings on the Devon Scouts website shows that bookings are prioritised for Scout and Guide use. On this site there is evidence that:



- The public can book, but dates are limited.
- The public dates were fully booked and often booked a year in advance.
- The site is not open all year.

2. Availability of Caddihoe shows that there is a demand for camping for those who have local knowledge or have researched months in advance. The camping user group is limited, as it provides a very basic camping experience. There is capacity within the parish to have more campsites which provide a different experience and infrastructure.

3. Applications for the development of sustainable tourism-related camp sites would be welcomed and supported by the parish, particularly if they are sympathetic to the surrounding countryside and meet the requirements and expectations of the visitors who are attracted to our parish (see Figure 40).



Figure 40: Types of camping provision suitable in a rural setting

Policy ET3: Caravan and Camping Sites

Intent Policy ET3

The purpose of Policy ET3 is to develop camping provision across the parish.

Policy ET3. Camping Sites

Development proposals for:

- Camping sites offering a range of styles, types, and qualities of camping to include Tents, Yurts, Shepherd Huts, Pods & Lodges and Tree Houses

will be supported, especially those with good access to local services and facilities.

Development proposals should respond positively to the following criteria:

- Sites should demonstrate the way in which their scale and layout can be satisfactorily accommodated in the local landscape and how any landscaping and screening measures would mitigate any identified impact on the character of the landscape.
- Sites should have appropriate and safe access onto pedestrian and cycle routes and the road network.
- Ancillary site facilities (retail and recreational) should be of a scale appropriate to the size of the site.
- Appropriate levels of parking should be provided prioritising sustainable transport modes e.g., installation of bicycle parking and /or bike hire provision.
- The detailed design of proposals should ensure that they do not unacceptably impact on neighbouring residential properties.

Development proposals for camping sites in the Clyst Valley Regional Park will not be supported other than where they positively contribute towards achieving the objectives of the Park.

Justification Policy ET3

1. The rationale for limiting the scale of such sites is to ensure that such sites do not become holiday accommodation parks but remain small scale and proportionate to the size and scope of the parish.
2. The inclusion of a variety of styles and types of camping was deliberate to ensure that sites offer a range of camping experiences and priced packages. The styles in Policy ET3 are heavily based on types that fit the wooded and rural landscape so that the sites can relate sensitivity in scale and setting, as illustrated in EDLP (2013-2031) E19.
3. The emphasis of transport options is to encourage the users of such sites to use sustainable travel options. The camping types in the policy offer a range of options where accommodation is fully furnished reducing reliance on vehicular use. The proximity of sites to tourism centres offered in Policy ET1 builds upon a sustainable transport model. Some onsite provision also helps to reduce vehicular use.
4. Policy ET3 offers a form of rural diversification for the numerous farms within the parish. Such provision would allow the farms to be complimentary or compatible with ongoing agricultural operations as supported in EDLP (2013-2031) Policy E4.
5. The policy is also in line with strategy 28 of the EDLP (2013-2031) which is in support of sustaining and diversifying agricultural and traditional rural enterprises and adding value to rural produce.
6. The climate change agenda will change the role of farms and farmland by encouraging swathes of land to go back to its natural state (wilding), to be forested, to be natural flood land and other uses. Such proposals of diversification provided in this policy will help with the viability of agriculture.

4. Housing

Introduction and justification for housing.

In this chapter the introductory sections provide the justification for policies (H1 – H4) which direct the allocation of housing.

Change of Housing Patterns in Broadclyst Parish

Broadclyst Village

Historically the largest housing settlement in the parish has been Broadclyst Village. The population in the 2011 Census was 2962 people in 1,255 households, with the largest number of households located in Broadclyst Village. However, there has been significant strategic residential development since, and in 2017 the Housing Needs Survey (2017) revealed an increase of 282 new dwellings in Westclyst with the parish total number of houses as 1,537.

Westclyst

Future housing numbers in Westclyst are provided in Figure 41, and these will bring forward yet more new houses in the parish:

- Total future number of houses in the Parish = 4,413 (existing and new).
- Total number of new houses in Westclyst Area= 3,158.
- 258% increase of housing stock.

Provision of housing will see the biggest centre of population move away from Broadclyst Village to Westclyst and Tithebarn as seen in Figure 42.

Site name	Housing numbers (numbers still to be built in brackets)	Housing in the planning process
Pinn Court Farm	466 (196)	-
Taveners Field	-	71
Old Farm Park Phase 1	439 built out	-
Old Farm Park Phase 2	317 (180)	-
Moonhill Copse	35	-
Tithebarn	580 (362)	-
Tithebarn (Mosshayne)	900	-
Blackhorse Science Park	-	150
Total housing numbers: 2770		
Potential Total: 2991 (including those in planning application process)		

Figure 41: Housing numbers for Westclyst/ Tithebarn

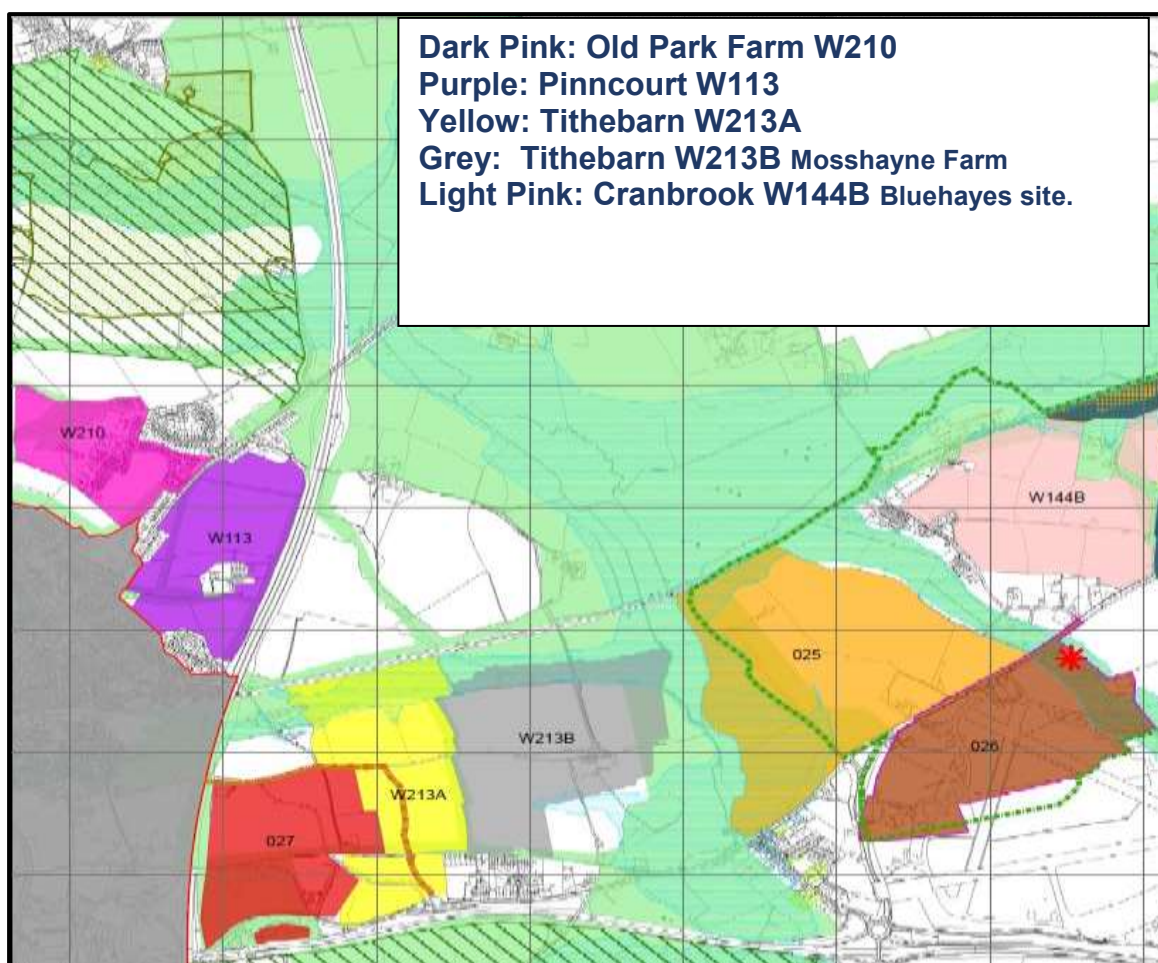


Figure 42: East Devon West End Housing sites W210, W113, W213A W213B in Broadclyst Parish.

Other Communities

Within the parish there are other named communities scattered around the parish, which have between 10 – 90 houses. The bigger communities are Blackhorse, Broadclyst Station, Budlake and Westwood. The density and layout of housing in these communities vary greatly with Westwood being a low-density sprawling layout whereas Blackhorse has a high-density compact layout. Several are linear communities developed along a road as seen at Burrow, or centralised as seen in Columbjohn.

There are a great number of isolated houses and farms throughout the area, showing that housing development in the open countryside has been a pattern in the provision of houses throughout the parish in the past.

Housing Stock

In the Housing Evidence Chapter (Appendix 10) the following aspects related to Housing in the parish are presented and analysed. These have informed the policies of this chapter:

- Council tax banding within the parish;
- House prices and income;
- Housing tenure;
- Housing Needs Survey.

Planning Policy Context for Housing in Broadclyst Parish (2012- 2021)

1. The East Devon Local Plan sets the context for housing development and provides a 'strategic framework' for development.

2. In 2012, a draft version of the East Devon Local Plan (EDLP (2013-2031) suggested that 30 dwellings could be accommodated in Broadclyst Village, which received support in principle, from the local community following an EDDC consultation. Since that time, EDDC was required, by the Local Plan Examiner, to revisit the strategy and level of development proposed for settlements. This review has resulted in a revised policy in the adopted version of the Local Plan which draws back from setting a figure for new housing development within villages.



Figure 43A: Broadclyst Build up Boundary (2018)

3. The EDLP (2013-2031) strategy 27 "Development at the Small Towns and Larger Villages" identifies Broadclyst Village as one of the sustainable settlements that offers a range of facilities and services to meet many of the everyday needs of residents. The policy states that the village will have a built-up area boundary (BUAB) designated in the East Devon Villages Plan 2018⁷⁴, as seen in Figure 43A. The Cranbrook Plan Development Plan Document was adopted in October 2022. Policy CB8⁷⁵ of

⁷⁴ <https://eastdevon.gov.uk/planning/planning-policy/other-plans/villages-plan/adoption/>

⁷⁵ <https://eastdevon.gov.uk/media/3724766/cranbrook-plan-dpd-adopted.pdf>

that Plan includes a built-up area boundary for Broadclyst Station. That built up area boundary is shown in Figure 43B.

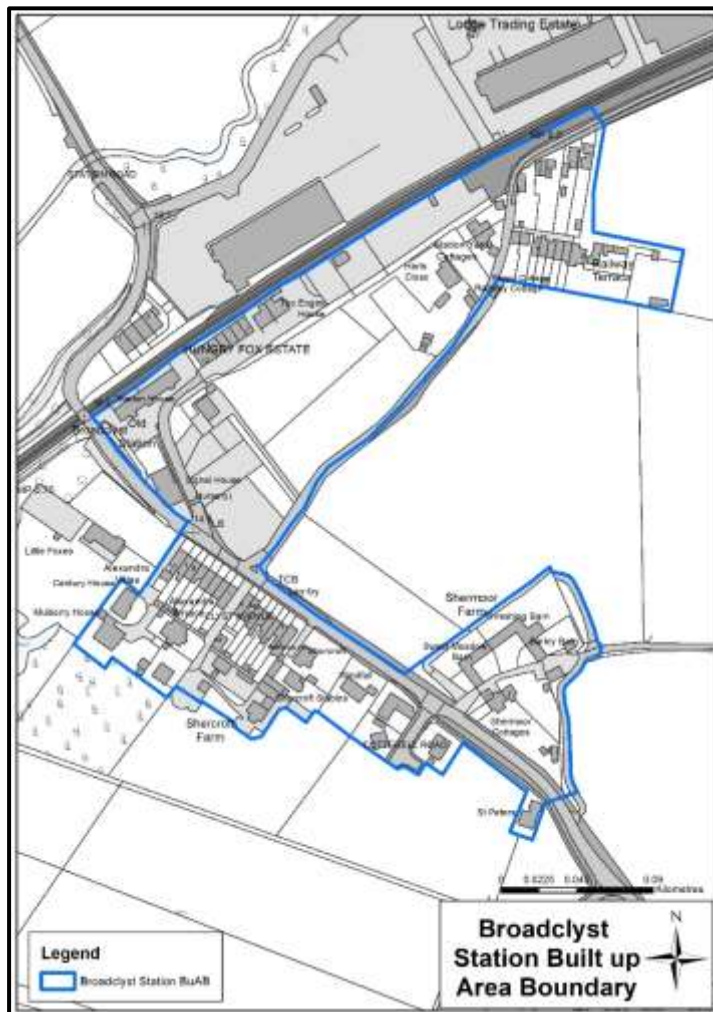


Figure 43B: Broadclyst Station Built up Boundary (2022)

4. Strategy 27 also goes on to say that Broadclyst Parish will not have land specifically allocated for housing development in the East Devon Villages Plan and that,

“If communities wish to promote development other than that which is supported through this strategy (the Local Plan) and other strategies in the Plan (at the settlements listed above or any other settlement) they will need to produce a Neighbourhood Plan or promote community led development (for example Community Land Trusts) justifying how and why, in a local context, the development will promote the objectives of sustainable development.”

So, having reached a level of agreement in principle for around 30 dwellings to be built in the next 10-15 years, the 2016 Local Plan does not set a number. Broadclyst Parish no longer has a specific housing number provided outside strategic allocations, therefore the policy position outlined in the adopted Local Plan is for an unknown number of houses to be located both within the Broadclyst BUAB and its countryside.

5. However strategy 6 allows development in a NP to go beyond the BUAB,

The EDLP (2013-2031) strategy 6 development within built up area boundaries states that,

“Where a local community prepare a Neighbourhood Plan they may specifically allocate sites and /or include criteria based or other policies for promoting development/ land uses beyond the boundary. Such ‘outside of boundaries’ policy provision would supersede relevant constraint considerations set out in Strategy 7 - Development in the Countryside and also other relevant constraint policies.”

This supersedes the constraints identified in Strategy 7 – Development on the Countryside,

The countryside is defined as all those parts of the plan area that are outside the Built-up Area Boundaries 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 or Neighbourhood 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.*

6. In May 2019 a revision of guidance for Neighbourhood Planning (para 65), stated that,

“Strategic policies should set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement (paragraph 65 of the revised National Planning Policy Framework). Where this is not possible the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body”.

7. In the EDLP (2013-2031) 16.29 parishes are grouped together for the provision of affordable housing need. Broadclyst Parish is grouped with Parishes of Clyst Honiton, Clyst Hydon, Clyst St Lawrence, Rockbeare and Poltimore. The local planning authority provided an indicative figure in 2019 of zero, as seen in Figure 44.

Parish	Dwellings built 01 April 2013 to 31 March 2018	Dwellings with planning permission/ under construction at 31 March 2018 (Including allocation sites with permission)	Dwellings that have made significant progress through the planning system/ have acknowledged development potential (including allocation sites)	Local Plan (28/01/16) Villages Plan Total Housing	NP Housing Requirement Figure
Broadclyst	500	1,407	900	2,807	0
Clyst Honiton	6	8	0	14	0
Clyst Hydon	0	4	0	4	0
Clyst St. Lawrence	3	1	0	4	0
Poltimore	4	1	0	5	0
Rockbeare	16	6	9	31	0

Figure 44: EDDC Indicative housing requirement for Broadclyst grouping. (2019)

8. In the EDLP (2013-2031) 6.13 there is an estimated number of 130 houses per year that will come forward on windfall sites, but these houses are not allocated to any specific locations, including parishes.

9. In summary, housing that has been allocated in the parish in the EDLP (2013-2031) are those coming forward within the BUAB and on strategic sites. Therefore, any community led/ need housing to come forward would have to be achieved through a neighbourhood plan on land that is labelled in the EDLP (2013-2031) as “Development in the Countryside” in strategy 7.

10. The Housing Needs Survey remains valid for a five-year period (March 2022) and, at the time of writing, EDDC has nothing to supersede this locally based housing need. The only data on housing need for affordable housing is in Figure 46.

11. The GESP housing need⁷⁶ documentation and the recent EDDC housing assessment in 2020⁷⁷ does not inform or provide generic housing need for Broadclyst Parish. In Figure 11 of the EDDC housing assessment document, there is evidence that the proportion of social rent houses has been dropping since 1981 and the volume of each house type social rental is lowest at 5.5. Using the process set out in the PPG for housing assessment need, the standard methodology provides a calculated number of houses required (656). Adjustments to take account of affordability leads to an increase in the number of houses by 245, with this adjustment resulting in an overall housing need number of 900, which does not necessarily correlate with the split of market and affordable dwellings. This level of housing need does not inform level of housing for our parishes. The strength of a locally based Housing Needs Survey is the provision of real data about local housing need and tenure.

National Planning Policy Context for Housing

1. Section 5 of NPPF (2021) sets out the Government’s objective of significantly boosting the supply of homes.

2. Para 69 of NPPF (2021) states that small and medium sized sites can make an important contribution to meeting the housing requirement for the area, with paragraph 70 stating neighbourhood plan groups should also give particular consideration to the opportunities for allocating small and medium size sites (of a size consistent with para 69a) suitable for housing in the area. It is also expected that at least 10% of the district’s housing requirement should be met on sites of no more than 1 hectare.

3. The principle of exceeding 43 units in the Neighbourhood Plan is supported by Government policy. There is no need to demonstrate justification to exceed this figure,

‘where neighbourhood planning bodies have decided to make provision for housing in their plan, the housing requirement figure and its origin are expected to be set out in the neighbourhood plan as a basis for their housing policies and any allocations that they wish to make. Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it.’

⁷⁶<https://devoncc.sharepoint.com/sites/PublicDocs/Planning/Planning/Forms/AllItems.aspx?id=%2Fsites%2FPublicDocs%2FPlanning%2FPlanning%2FGESP%2FEvidence%2FLocal%20Housing%20Needs%20Assesement%202nd%20Edition%2Epdf&parent=%2Fsites%2FPublicDocs%2FPlanning%2FPlanning%2FGESP%2FEvidence&p=true>

⁷⁷<http://eastdevon.gov.uk/papers/strategicplanning/201020bpltem9aFinalHousingneedsinEastDevonAppendix%201ORSAug2020.pdf>

4. Further national advice provided suggests that where neighbourhood planning bodies intend to exceed their housing requirement figure, proactive engagement with their local planning authority can help to assess whether the scale of additional housing numbers is in general conformity with the strategic policies. For example, whether the scale of proposed increase has a detrimental impact on the strategic spatial strategy, or whether sufficient infrastructure is proposed to support the scale of development and whether it has a realistic prospect of being delivered in accordance with development plan policies on viability. The level of 44 houses developed over a 10-year span in three different settlements or communities with infrastructure at Regulation 14 was deemed to be in general conformity with the EDLP (2013-2031).

Meeting the Housing Needs of the Community

1. As neighbourhood plans in the EDLP (2013-2031) (Strategy 6 and 27) are seen as a vehicle for bringing forward residential development, community surveys and consultation events sought evidence of housing needs of parish residents. The consultation material revealed four main housing needs:

Affordable housing: The Housing Needs Survey, undertaken in 2017 (Appendix 8), established that there was then a need for 16 affordable dwellings and 27 open market houses in the Broadclyst Parish. In terms of tenure, 14 of the households in need qualified for affordable rent, two may have been able to afford a shared ownership. With regard to the size of dwellings identified, 11 x one- or two-bedroom properties for singles/couples; 4 x two-bedroom properties for families; and 1 x three-bedroom property for a family were needed. There is support for development meeting the identified affordable needs of local people to 2022. Beyond that date an up-to-date housing needs assessment would be required.

Small scale housing: The Housing Needs Survey (HNS) and community consultations established that there was support for small scale housing development. In the potential NP Housing Sites Consultations (2019), there was strong support for sites that would provide up to 24 houses only. This is in stark contrast to the large housing sites being brought forward as strategic housing by EDDC. The HNS established a need for 27 open market houses which could be delivered across allocated sites. Development of small and medium sites is supported by the NPPF (2021 Para 69) who recommend these sized sites as making,

“an important contribution to meeting the housing requirement of an area and are often built out relatively quickly”.

Mix of houses to include open market: The HNS and community consultations, established that there was support for mixed housing sites. A mix of houses would ensure the lower two Council Tax bandings (A and B) would be available for purchase and rent across the parish for people on lower incomes. The NP housing sites, supported by the community, are designed to meet local housing need to include a mix of tenure, size and type of dwellings, including self-build and live/work units.

Impact of housing: Significant concern was expressed during the consultation process regarding development outside the current Built Up Area Boundary (BUAB), and the potential adverse environmental effects and visual impact it could have on the landscape. Whilst the negative issues are acknowledged, the benefit to the parish of additional affordable and open market mixed housing must be balanced against any perceived negative impact. Any development proposal must therefore include measures to mitigate any negative environmental impact. The site allocation policies and other policies in the Plan, such as Policy NE5 making requirements of a 10% biodiversity net gain, supports this community aspiration.

The primary consideration for any proposed scheme outside of the BUAB must be a balance of the number of affordable houses, the mix of houses, and the provision of infrastructure for the community, against the overall visual impact and mitigation measures. There will be a need for each site to minimise its impact on the landscape setting and the environment. The setting of a housing density of 21 houses per hectare was to ensure that impact of housing on a landscape setting was built into the development and delivery of each site.

Housing: Aims and Objectives

The NP policies seek to enable new residential development to provide a mix of homes, affordable housing and houses allocated for social rent, in perpetuity for locals which are justified by meeting local need. The Steering Group goals and priorities are provided in Figure 45 and were used to add to the material collated from the Community Survey and the Housing Needs Survey to create the housing aims and objectives.

Priorities	Goals to achieve the priorities
To increase accessibility and affordability to housing for local people.	<p>Support the development of affordable rental and shared equity/ownership housing and/or housing which includes rent or sale mechanisms that are in line with national guidance.</p> <p>Provide 16 affordable houses for people with local connections.</p> <p>For sites to provide 50% affordable houses with half of these houses to be for social rent in perpetuity for locals.</p>
To support housing development which fulfils an identifiable open market local housing need.	<p>To provide 27 open market houses.</p> <p>For 50% of the houses on a site to be open market houses</p> <p>To support a supply of self-build dwellings.</p> <p>To support a supply of live-work units.</p> <p>To provide an appropriate mix of dwelling in terms of number of bedrooms and tenure of houses to meet local needs.</p> <p>To ensure that the requirements of the elderly and disabled are given appropriate consideration in the design of buildings and developments.</p>
To support development where it provides an identifiable community infrastructure need.	For housing sites, where possible, to provide a community infrastructure need such as a: play park, community garden, land for pedestrian/ cycle paths.
To ensure new houses are designed to be compatible with their immediate surroundings.	<p>To ensure that new dwellings are developed in line with the Broadclyst Neighbourhood Plan design policies to:</p> <ul style="list-style-type: none"> • minimise impact on the landscape setting and the environment. • ensure net gains for biodiversity. • ensure reduction of carbon emissions. • adhere to a housing density of 21 houses per hectare or lower.

Figure 45: Steering Group priorities for housing in Broadclyst Parish

Call for Sites, Sites selection and Public Site Consultation Events

1. As there are few opportunities for houses to be developed within the current BUAB other than one or two-unit infill plots, strategy 6 of the EDLP supports the NP in sourcing and allocating sites outside the BUAB as well as allowing sites to supersede the constraints of strategy 7. An evidenced local housing need, to ascertain both affordable and open market houses, and a call for sites was triggered.

2. In 2017 a Call for Land brought forward 28 sites, some of which provided some residential development. AECOM completed a Sites Option Assessment (2019) (Appendix 18) and reported on nine residential sites. The sites progressed through stages to prepare for a public sites consultation event and at each stage these were reviewed by the NP Overview Steering Group. Throughout this process several sites were withdrawn from the process for a variety of reasons. These stages are detailed in Appendix 19.

2. Seven potential housing sites were put forward for public consultation in 2019. After the consultation events in 2019, the selection process identified four preferred housing sites for allocation in the Regulation 14 Draft NP.

3. Comments by Statutory Authorities resulted in the Overview Steering Group withdrawing one site from the NP process, leaving three sites in the Regulation 16 Draft NP.

Policies allocating sites for houses

1. 44 houses are being allocated on three housing sites within the Plan period. This works out at just over 4 houses per year.

2. Each site is small, with the biggest site having a maximum of 24 houses. Local need affordable housing is met in full whereas open market housing falls three short of the local need evidenced in the Housing Needs Survey.

3. The number of houses on each site has been set at a density of at or below 21 per hectare with, in comparison, local housing strategic policy densities being 30 per hectare at Westclyst and 40 at Cranbrook. This density was set to support local community support for smaller scale housing sites with lower densities, so development sites are in keeping with their settings and local infrastructure.

4. The community supported housing development in the parish on the basis that the sites closely meet the local need for:

- 43 houses (16 affordable and 27 open market housing), and
- social rent houses in perpetuity for locals.

5. Three sites finally selected are located adjacent to three different established communities within the parish. The process of site selection is detailed in Appendix 19.

6. The material provided so far in this chapter sets out the context for the communities' support for housing growth, and the allocation of sites and policies supporting residential growth. The initial material in this chapter provides the justification for the policies within this chapter. Further justification is provided in a short justification section after each policy.

7. The NP, BCS and SEA provide evidence that the housing allocations are in general conformity with the strategic ED spatial strategy, and that the housing sites are supported by infrastructure and are appropriate for such development (AECOM report).

Site Viability

1. The Scoping Opinion on Viability Report (2022) (Appendix 36) looked at the viability of the housing sites H1-3. The content of this report is for feasibility assessment purposes, as economic viability is a material consideration in the establishment of planning policy and determination of planning applications. The NPPF (2021) considers development viability to be a central consideration in delivering sustainable development. It was therefore important to assess the housing sites to determine whether the sites, with the tenure mix and the NP affordable housing requirement, could be delivered as part of a financially viable development. This assessment would also need to assess if the Planning Authority's requirements for planning gain and affordable housing are met.

2. It is to be noted that to ensure viability the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements, should, when taking account the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable. CIL at the prevailing rates was included in the assessment.

Policy H1: Blackhorse Gardens Site

Intent Policy H1

For a small development at Blackhorse to provide two live-work units and two further houses.

Policy H1 – Blackhorse Gardens Site

Land at Blackhorse Gardens identified in Figure 46 is allocated for a small-scale development to include the following:

- **2 live-work units (maximum of one and a half storeys)**
- **2 houses (maximum 2 storeys)**

Proposals should meet the following site-specific requirements:

- 1. Development proposals should incorporate mitigation features for aircraft related noise;**
- 2. Dwellings to reflect the distinctive style of buildings in Blackhorse as specified in the Broadclyst Parish Design Code (Appendix 14);**
- 3. The provision of safe vehicular, pedestrian and cycle access.**

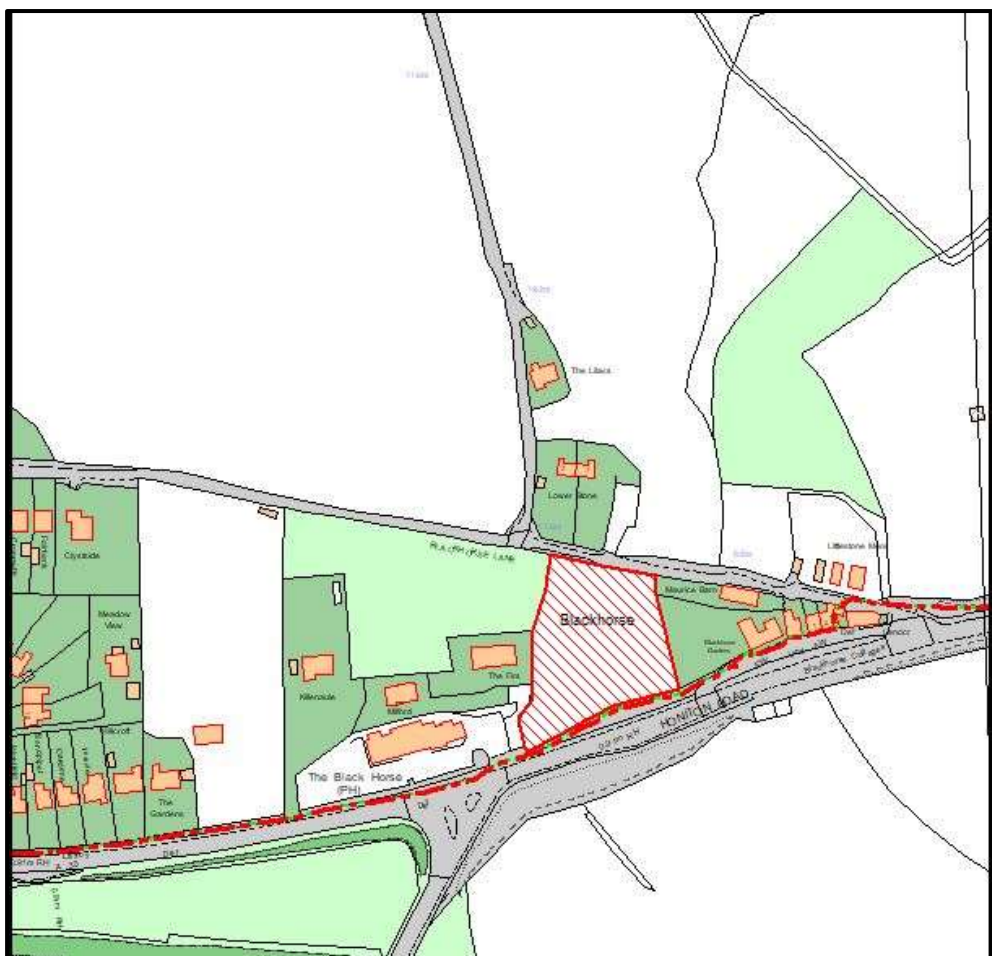


Figure 46: Blackhorse Gardens Site H1 (in red hatched area) in the ~~settlement~~ community of Blackhorse

Justification Policy H1

1. At public consultations this site was well received with few changes being suggested. The strength of this site was the small number of dwellings, and that two of these would bring forward specific live-work units which were supported in the HNS. This is the only housing site where live-work units are specified within the policy.

2. Public consultation recommendations were processed by the Overview Steering Group and the policy was amended to include:

- Add maximum storey details for the houses. This was because the topography of the site would result in houses larger than two storeys being too intrusive in a community where size and scale of dwelling is very distinctive and would be detrimental to the skyline.
- Adjustment from the need of a transport assessment requirement to a transport statement to enable infrastructure considerations and viability of the site.

3. Inclusion of live-work units is presented in the justification section of Policy H7 and were well supported by the community prior to Covid-19, as evidenced in the Housing Needs Survey. Residential models providing workspace has an increased level of support in light of increased levels of home working due to Covid-19.

There is not an established definition or any building regulations specifications as to what a live-work unit constitutes. For this Neighbourhood Plan there was a need to provide a definition of a live-work unit as planning permission will be required for this type of development. A definition below is to provide a context for the policy:

“A live work unit is defined as the provision of a room with an external door (on either floor) that is designated as an office /workspace for those residing therein and is to be in addition to the specified number of bedrooms and bathrooms, any other living rooms including a utility room and, in addition to a garage if included.”

4. The Scoping Opinion on Viability Report (2022) (Appendix 36) reported that a fully open market development on this site would generate a residual land value in the region of £227,000 (rounded), equivalent to £566,302 per hectare. This is above the benchmark land value of £450,000 per hectare as described above and therefore the site would be considered viable. The appraisal model is attached in Appendix 4 of the Scoping Opinion on Viability Report (2022).

5. The arguments for the support of live-work units has been covered in the section before the policy but, as well as recent Covid-19 requirements, there is also now acceptance that the needs of rural micro businesses cannot be met within or by adjoining settlements, communities or in areas well served by public transport, but can instead be met through development of live-work units.

6. The AECOM site options work and the SEA assessed the site for heritage assets, and both authors confirm in their reports that site development would be unlikely to impact upon local heritage assets.

Policy H2: Broadclyst Station: Site between Shercroft Close and Cotterell Road

Intent Policy H2

For this site to provide houses, a children’s play area and land for part of the Exeter to Cranbrook cycle route.

Policy H2: Broadclyst Station: Site between Shercroft Close and Cotterell Road.

Land at Broadclyst Station identified in Figure 47 is allocated for 24 residential dwellings to include the following:

- 12 affordable houses (providing the affordable housing breakdown in Policy H4.).
- 5 self-build plots.
- 7 open market houses.
- Children’s play provision (local equipped area of play (LEAP)).
- Provision of land for a 5m pedestrian and cycle lane for the Cranbrook to Exeter Cycle route.
- Landscaping to include a new hedgerow with trees along the Station Road boundary of the site.

Proposals should meet the following site-specific requirements:

1. Provision of active travel access to houses, play area and onto the Cranbrook to Exeter cycle path.
2. The development of a comprehensive masterplan including the provision of an element of residential development to follow the existing linear development pattern along Station Road.
3. Taking account of an assessment of flood risk and ecological constraints and opportunities, having appropriate regard to the proximity of the site to the Clyst Valley Regional Park (CVRP).
4. Appropriate access is provided to the new habitat, boardwalk trail and picnic area to be provided adjacent to the site as part of the proposals for CVRP.
5. The provision of an appropriate access into the site.

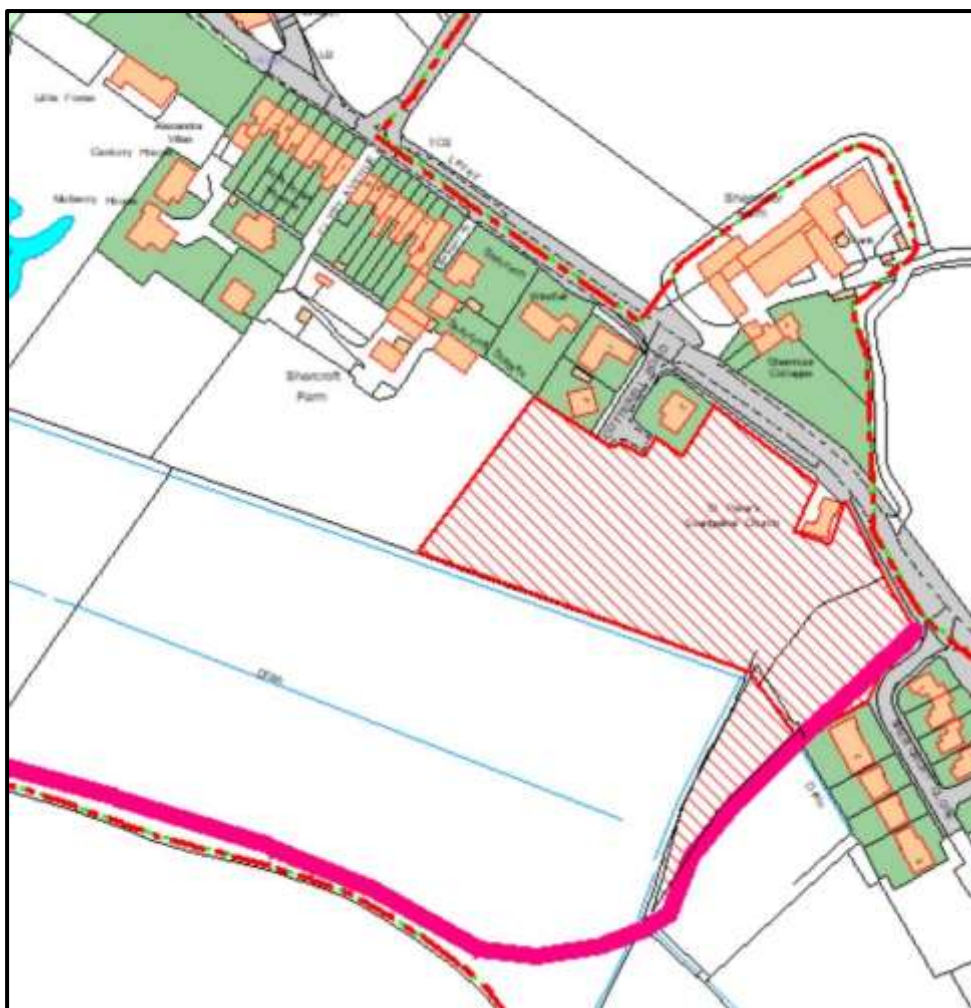


Figure 47: Site H2(hatched red area) in Broadclyst Station with the route of the Cranbrook to Exeter cycle path shown in pink

Justification Policy H2

1. This addition of the type of play site was well received at public consultations and its strength was that, as well as housing, the site provides land for the Cranbrook to Exeter Cycle path and space for a children's play provision.

2. Policy recommendations in consultations were resolved with the Overview Steering Group agreeing the following:

Provision to be included to ensure that a specific age group would be catered for in relation to play. A LEAP would provide play facilities within a fenced area.

- Noting that provision of bullet points 1 and 2 in the policy had potential to be designed in alignment with the Bluehayes (Cranbrook western expansion zone) to help ensure that layout of houses and routing of cycle path are linked for maximum effect and efficiency to Bluehayes.
- Inclusion of bullet points 3 and 4 were to ensure that these were linked with the site's location in relation to the CVRP.

3. The development of the site has been tested for viability purposes. The requirements in the policy for the site to make provision for a LEAP and land for the Cranbrook to Exeter cycle path have been taken into consideration in the balance. In these circumstances the traditional expectation for a

contribution towards the delivery of community facilities will not apply to the development of the site.

4. A further strength of this site is that it is the only site that provides five self-build plots, which the community requested and are in support of. There is recognition that this type of housing is supported by the NNP and NPPG as it helps to diversify the housing market. Policy H6 provides further evidence and justification.

5. The agreed housing density of 21 houses per hectare reflects the initial community need list, where the community were only in support of housing sites of up to 24 houses and that such sites were to be low density to minimise impact on the local setting. This site, as well as bringing forward 24 houses, provides land for a play area and the Exeter to Cranbrook cycle path. The number of houses being brought forward (on the whole site of 3.1 hectares) is lower than the agreed housing density levels as some of this land is being used to provide two leisure infrastructures for the community, which will further help to provide a setting.

6. The Scoping Opinion on Viability Report (2022) concluded that there is sufficient scope for the developer to bring forward a viable scheme. The modeling for this site is presented in Appendix 5 of the report. The modelling assessed viability for the following tenure options:

- A fully open market development of 19 dwellings plus five self-build plots
- Affordable housing based on three different tenure splits.

Testing on all tenure options resulted in land values considered to be viable.

For affordable housing, the first option assumed all affordable housing is provided as intermediate homes on the principles of First Homes at 70% of open market value. There was sufficient viability headroom to suggest that more affordable housing that is rented could be viable. A tenure split of 50/50 affordable rent to intermediate ownership. The intermediate ownership is split equally between First Homes and shared ownership, modelling overall at 65% of open market value. This model results in a residual land value that would be viable.

The tenure mix is set out in the Neighbourhood Plan, requiring a 50/50 split of social rent to intermediate ownership, split between First Homes and shared ownership. This model against the benchmark land value would be marginally viable, but the report noted that many of the value assumptions are conservative. Sensitivity testing of a 5% increase in market values would derive an equivalent land value of £563,000 per hectare, a 5% decrease in costs would derive an equivalent land value of £602,000, both of which would be considered viable. It is considered therefore that there is sufficient scope for the developer to bring forward a viable scheme.

7. In the expansion of Cranbrook there will be significant gain to the Broadclyst Station settlement that presently has no community facilities, and the site will sit within the Cranbrook and Broadclyst Station Built-up Area Boundaries Policy CB8. Additional to extra facilities being developed within Cranbrook, this development will add land of amenity importance and recreational value in the provision of a LEAP and a cycle path to Exeter and Cranbrook. This was well supported by the Broadclyst Station community as there are presently no public facilities within this settlement.

8. The site is also providing land for a new cycle route which will run from Cranbrook to Exeter via a more off-road route. This route will facilitate public access to a new habitat, trail, and an open public space/ picnic space is to be provided adjacent to the site as part of the proposals in the CVRP. This means that the site benefits are beyond the provision of houses but also facilitates public access to new areas and an active travel infrastructure.

9. The AECOM site options work and the SEA assessed the site for heritage assets, with both authors confirming in their reports that site development would be unlikely to impact upon local heritage assets.

10. The site was renamed from Clystlands to site between Shercroft Close and Cotterell Road, as it was clear that there was some confusion as to the exact location of the site. Earlier in the sites allocation process there had been two sites labelled Clystlands North and Clystlands South. This renaming provides the exact location of the site.

Policy H3: Broadclyst Village: Heathfield Site

Intent Policy H3

To provide houses in a site close to Dog Village in Broadclyst Village.

Policy H3: Broadclyst Village: Heathfield Site

Land on the edge of Broadclyst Village identified in Figure 48 is allocated for a small-scale development of no more than 16 Houses.

Proposals should meet the following site-specific requirements:

- 1. To provide the affordable housing breakdown in Policy H4.**
- 2. Provision of a safe vehicular access from Whimble road.**
- 3. Provision of a separate access for pedestrians to be located away from the site's vehicular access and the existing junction of Whimble Road and Woodland Road.**
- 4. Any unavoidable loss of existing boundary vegetation should be replaced on the site as part of a landscaping/ planting scheme.**
- 5. The site design and layout should also take account of the TPOs (Appendix 24)⁷⁸ across the site.**
- 6. Land for the provision of a public footpath to the allotments is to be safeguarded for future access.**
- 7. The design and layout of the site should ensure that development will not cause unacceptable harm to Heath Gardens and its setting.**
- 8. The design, layout, and levels of the scheme should not cause unacceptable harm to the amenity of the existing homes on the northern side of Sanders Close.**

⁷⁸ <https://eastdevon.gov.uk/trees/tree-preservation-orders-and-trees-protected-in-conservation-areas/>

3. At Public Consultations this site was well received with only minor amendments and additions required. The main feedback was on the heritage methodology in the site allocation process to address Historic England's concerns about the need to reference to Heathfield Gardens in the policy. Another statutory amendment was to add a reference to EDDC's TPO map and that the site benefits from several TPOs. Both have been addressed in site specific requirements 5 and 7.

4. Post completion of the Regulation 14 Draft NP, access to the allotments through this site was raised by the community and steering group members. The route was not within the policy site specific requirements at Regulation 14. During the Regulation 14 consultation process the allotment association members were consulted on a new potential route to the allotments from this site. A sample of responses are in Appendix 7 (Regulation 14: Community responses document). The Overview Steering Group discussed the possibility of a public access route to the allotments within the specific sites requirements of Policy H3 and looked at the responses received. The allotment association responses although not all positive, agreed that it would be better for an access route to be available and built into the site design and layout rather than lost forever. The decision made was to include in the Regulation 16 policy a site-specific requirement (point 6) to safeguarded land for a public access route to the allotments in the future. This is in point 6 of the policy.

5. Traffic has been an ongoing concern linked to this site for a variety of reasons:

- Speed of traffic along the road.
- Creation of a four-way staggered crossroads.
- Safe pedestrian access.

To overcome these issues Community Infrastructure Levy money from Site H3 will go towards the funding of a 20mph Traffic Reduction Order (TRO) on Whimple Road in close proximity to site H3. This will help with traffic speeding issues. DCC supported a pedestrian access being away from the staggered 4-way junction, confirming that an alternative separate safe access for pedestrians is supported despite loss of a small section of the boundary hedge, which will be mitigated by Policies T3 and NE5d.

6. The Scoping Opinion on Viability Report (2022) concluded that there is sufficient scope for the developer to bring forward a viable scheme. The modelling for this site is presented in Appendix 6 of the report.

The mix of housing in this policy is assumed to be 6 two-bed semi-detached homes, 2 three-bed semi-detached homes, 2 three-bed detached homes, 5 four-bed detached homes and 1-five bed detached home. The affordable housing is allocated to the semi-detached homes with market housing all being detached. A model considering a fully market housing scheme, to identify any viability headroom, demonstrated that there would be viability headroom for planning obligations including affordable housing.

Affordable housing was assessed in relation to three tenure split alternatives. The intermediate homes model provided on the principles of First Homes at 70% of open market value found that there was sufficient viability headroom to suggest that more affordable rented housing could be viably accommodated within the tenure mix. The intermediate ownership split equally between First Homes and shared ownership and modelled overall at 65% of open market value was also considered viable. The mix is set out in the Neighbourhood Plan, requiring a 50/50 split of social rent to intermediate ownership. This model results in a residual land value of £360,000 (rounded), equivalent to £468,000 per hectare, producing a benchmark land value to be marginally viable, but it also reported that it should be noted that many of the value assumptions are conservative. Sensitivity testing of a 5% increase in market values would derive an equivalent land value of

£649,000 per hectare, a 5% decrease in costs would derive an equivalent land value of £690,000, both of which would be considered viable with significant headroom above the benchmark land value. It was considered that there is sufficient scope for the developer to bring forward a viable scheme on the site as set out in the Neighbourhood Plan.

General Housing Policies

Throughout the Broadclyst Neighbourhood Plan's lifespan there will be planning applications coming forward for sites beyond those allocated in this NP. The first policy covers affordable housing percentages for allocated sites. The remaining policies are general housing policies on non-allocated sites which will inform planning applications on the type of development that is in line with community needs.

Delivering Affordable Houses

1. There are a total of 70,175 dwellings in East Devon, of which 6746 are considered affordable.⁸⁰ Affordable dwellings in this context are Local Authority owned, private registered provider, and other public sector providers. This proportion of affordable dwellings in East Devon is 9.6% is lower than both the county 11% average and national 17.2% average, meaning East Devon are providing 55% less affordable housing than most areas in England.

2. The EDLP (2013-2031) sets district wide affordable housing targets:

- 25% of dwellings shall be affordable in 8 areas (Strategy 34).
- 50% of dwellings shall be affordable in all other parts of East Devon including all settlements not listed, coastal and rural areas and Budleigh Salterton and Sidmouth subject to viability considerations. The 50% figure applies to all areas that do not come under the 25% classification and which are permitted under Strategy 35 'Exceptions' policy (Strategy 34).
- 66% of dwellings shall be affordable in exception site mixed affordable and open market housing schemes at villages, small towns and outside BUAB for up to or around 15 dwellings (Strategy 35).

3. A 50% affordable threshold would be applicable to development only within the current Broadclyst BUAB, however there are few opportunities for development to reach the six-dwelling threshold at which affordable housing contributions are required (for developments between six and ten dwellings a contribution towards off site affordable housing will be expected, but this can be used district-wide). The Broadclyst Parish NP is therefore not able to deliver the need 16 affordable houses within the BUAB (Strategy 34) but can deliver this in sites outside the BUAB.

4. A 66% affordable threshold for developments up to or around 15 dwellings set in strategy 35 would be applicable to two of the housing sites selected by the community, as they are located outside the BUAB. The potential for a developer to deliver a viable housing scheme(s) outside of the BUAB, compliant with strategy 35, that would provide the number of social rental homes required in the Broadclyst Housing Needs Survey is virtually zero given build costs. This is evidenced in the development of Cranbrook where affordable housing ratios have continued to drop over the span of the build out programme. This is also evidenced in the EDDC provision of social rented housing in the

⁸⁰ Number of dwellings by tenure and district, England ,2019 Table 100

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

latest housing assessment.⁸¹ The NP therefore takes the pragmatic stance of proposing a policy within the Plan to facilitate the development of affordable housing in two of the sites selected by the community.

5. Development in Broadclyst Parish is challenging with construction costs above average because of the imposing community demands, and the stringent environmental and design conditions. Also, economies of scale are required to minimise unit construction costs. The possibility of the viability argument being used to reduce the percentage of affordable houses below the policy target of 66% is acknowledged. A figure less than the Local Plan target percentage may be acceptable as any open market housing development which enables delivery of some affordable housing is better than no housing provision.

6. The Plan aims to allocate the sites to be developed to comply with the strategy 34 threshold of requiring 50% but falling short of the 66% affordable threshold of strategy 35, with an additional clause that 50% of the affordable dwellings to be for social rent for locals in perpetuity. The specific criteria-based allocation for affordable development outside the BUAB is justified through the NP exceptions laid out in strategy 6.

7. The Broadclyst NP affordable housing-based criteria justifies development of affordable houses across three sites that are located adjacent to existing settlements or communities. The way each site meets this affordable criterion is set out in Figure 49.

Site Name	Local Community Need
Blackhorse Gardens Blackhorse 4 Houses	Provision of two live-work units. Provision of two open market houses. New pedestrian and cycle access. Improvement planting scheme for green corridors, boundary hedges and trees and for a new access onto London Road.
Site between Shercroft Close and Cotterell Road Broadclyst Station 24 Houses (12 Open market) (12 Affordable)	Provision of 50% affordable housing and 50% open market. Site to provide 50% of the affordable house allocation as social rental housing in perpetuity for locals. Five self-build Plots and seven open market houses providing a mix of houses. Provision of a play park. Provision of land for part of the Exeter to Cranbrook cycle trail. Provision of a new boundary hedge along Station Road.
Heathfield Broadclyst Village 16 Houses (8 Open market) (8 Affordable)	Provision of 50% affordable housing and 50% open market. Sits to provide 50% of the affordable house allocation as social rental housing in perpetuity for locals. Provision of 50% open market houses providing a mix of houses. Separated vehicular and pedestrian/ cycle access. Improvement planting scheme for green corridors and the four boundary hedges.
Meeting the Local Housing Need Requirement.	Affordable HNS = 16. Sites actually provide a total of 20 affordable houses. Open Market HNS= 27. Sites actually provide a total of 24 open market houses. Self-build: five provided. Live-work units: two provided. Housing sites provide 10 social rent houses for locals in perpetuity.

Figure 49: Details of site provision

⁸¹ <https://eastdevon.gov.uk/planning/planning-policy/housing-issues/housing-and-economic-land-availability-assessment/>

First Homes

First Home is a new type of affordable housing product. It was introduced by the Government through the Written Ministerial Statement (WMS) published on 24th May 2021 and it was upgraded and published in the national planning guidance (PPG) in December 2021.⁸² This product was released late in the production of the Broadclyst Parish NP. Prior to re-submission of the NP at Regulation 16, a First Homes section was added as the transition and exemption period for NPs had lapsed. The EDDC Draft First Homes Interim Guidance Note⁸³ agreed in February 2022, adopted the minimum requirements set out below, that the WMS set out for qualifying and eligibility criteria on First Homes.

1. A minimum of 25% of all affordable housing units secured through planning obligations to be First Homes.
2. Where the discount must be at least 30% against market value.
3. Having a first sale price (after the discount has been applied) of no more than £250,000.
4. Being sold to a person or persons meeting First Homes eligibility criteria.
5. Being subject to a section 106 agreement securing necessary restriction on the use and sale of the property and a legal restriction on the title of the property to ensure the restrictions are applied at each future sale.

The EDDC First Homes Draft Interim Guidance provides additional specific details on local connection and key worker eligibility criteria.

NPPF (2021) Affordable Housing

As well as the WMS 25% of affordable housing requirement for First Homes, the housing mix in a development should also ensure that at least 10% of the overall number of homes are affordable home ownership products as required by NPPF paragraph 65, subject to exemptions criteria.⁸⁴

Meeting Affordable Housing National requirements.

The NP is mindful that the 'in-combination' effect of NPPF and WMS policy should not change the 25% affordable social rented housing for those with a local connection and 25% other affordable house ownership products.

The Regulation 14 Affordable Housing Policy 50/50 split affordable and open market can remain in place as the affordable allocation provides 50% social rented houses and 50% open market provides the requirements of the:

- NPPF (2021) 10% affordable home ownership and
- WMS 25% First Homes,

under the umbrella of affordable products.

⁸² <https://www.gov.uk/guidance/first-homes>

⁸³ <https://democracy.eastdevon.gov.uk/mgAi.aspx?ID=9333>

⁸⁴ PPG First Homes Paragraph 023 Reference ID: 70-023020210524 provides further guidance

First Homes: Viability.

The recent planning application bringing forward 71 affordable housing (MRES 22/0559/) in the parish would suggest that viability and affordable houses are clearly not as related to deliverability as previously assumed. Legislation in place for First Home development enables viability and deliverability of sites by:

A. In the EDDC First Homes draft on-site and off-site provision of homes is outlined,

“In East Devon, First Homes will be secured through a S106 agreement and are expected to be delivered on-site unless off-site delivery or financial contribution is considered to be justified. This is in line with NPPF (2021) Paragraph 63. The approach contributes to the objective of creating mixed, balanced communities.”

B. For viability the PPG First Homes paragraph 16 makes it clear that Community Infrastructure Levy (CIL) regulations 30 allow developers of First Homes to be eligible for an exemption from the requirement to pay CIL.

Policy H4: Social and Affordable Housing

Intent Policy H4

This policy is to ensure that all new residential development in the sites allocated in the NP meets the local demand for affordable housing and the provision of affordable housing for locals in perpetuity on allocated sites.

Policy H4: Social and Affordable Housing

Proposals for the development of allocated sites H1 (Blackhorse), H2 (Broadclyst Station) and H3 (Broadclyst) in this Plan should be required to provide 50% affordable housing for those with a local connection with the following breakdown:

- **25% as affordable tenures to include:**
 - 12.5% First Homes**
 - 12.5% affordable schemes including the required NPPF (2021) shared ownership**
- **25% to be as social rental houses in perpetuity.**

Further Justification Policy H4

1. During the development of this plan, the community has demonstrated a desire for the development of more housing but only on the basis that a significant proportion would be social rental housing and houses for locals. Public consultation in the parish has also consistently identified the need to provide affordable housing with local occupancy conditions as a high priority. It is also recognised that, except for community led schemes benefiting from a fully discounted site, affordable housing can only be delivered as part of a mixed market housing development. The percentage of affordable houses required within any mixed market scheme has changed over the years. When the prospect was first considered, 40% affordable was acceptable (Policy H4 (Affordable Housing) East Devon Local Plan 1995 – 2011), compared to the current 50% or 70% required by the current Local Plan depending on the location of the site. Where a proposal does not meet the above targets, it will be necessary to submit evidence to demonstrate why provision is not viable or otherwise appropriate.

2. The PPG⁸⁵ on First homes sets out details on the Government's aspirations. Starting at paragraph 12, this confirms that plans should have 25% of all affordable housing secured through planning obligations as First Homes. Paragraph 15 then sets out what happens with the remaining 75% of affordable housing. In parallel, there is the need to have 10% of housing to be affordable home ownership. Paragraph 23 of the PPG states that First Homes can contribute to that as can other tenures like shared ownership. The present policy providing a 50/50 split of open market and affordable houses, accepted by the planning authority at Regulation 14, allows for the provision of applying the approach taken by government as Policy H4 would be at 50% affordable housing with a tenure split of 50% social rent: 50% affordable home ownership (25% First Homes: 25% other affordable housing such as shared ownership or discounted market sale). Such an approach would mean that 25% (50% of 50%) of housing proposed is affordable home ownership, which also satisfies the minimum threshold of 10% set out in the NPPF (2021). This provision is in line with the EDDC Draft First Homes interim guidance that was approved in February 2022.⁸⁶

3. The local connection criteria, except for section 2 which is Broadclyst group-specific, the connection criteria includes sections 1 and 3 which are the same as those in Local Plan Strategy 35 and in the EDDC Draft First Homes Interim Guidance Note. Rather than delete the duplicated text which would require Plan users to have to move between the Local and the Neighbourhood Plan, the local connection in relation to the social and affordable housing for Policy H4 is set out in priority order below:

1. Local connection in relation to the Parish (set out in priority order):

- a) persons who have been permanently resident therein for a continuous period of three years out of the five years immediately prior to the affordable dwelling being offered to them;
- b) being formerly permanently resident therein for a continuous period of five years at some time in the past;
- c) having his or her place of permanent work (normally regarded as 16 hours or more a week and not including seasonal employment) therein for a continuous period of at least twelve (12) months immediately prior to being offered the affordable dwelling.

2. Local connection then extends to those who live within the Broadclyst Parish grouping:

Persons who can demonstrate a close family connection to the Broadclyst parish grouping (EDLP (2013-2031) 16.29) Clyst Honiton, Clyst Hydon, Clyst St Lawrence, Rockbeare and Poltimore) in that the person's mother, father, son, daughter or sibling has been permanently resident therein for a continuous period of five years immediately prior to the affordable dwelling being offered to them.

3. Finally, local connection extends to those connected to the district:

Persons who can demonstrate a close family connection to the district in that the person's mother, father, son, daughter or sibling has been permanently resident therein for a continuous period of five years immediately prior to the affordable dwelling being offered to them.

3. Affordable housing with occupancy restrictions, favouring people with family, employment, or historic connections to Broadclyst Parish, is an important factor in maintaining social cohesion,

⁸⁵ <https://www.gov.uk/guidance/first-homes>

⁸⁶ <https://democracy.eastdevon.gov.uk/mgAi.aspx?ID=9333>

family ties and community responsibility. These all impact significantly on the wellbeing of the residents. Therefore, the provision of some affordable housing made available to local people in perpetuity is an important factor in maintaining the community social cohesion within the parish.

4. It was recognised that for affordable housing need, parishes are grouped together as seen in Figure 46. Parish groupings are supported in the EDLP (2013-2031) 16.29 for assessing housing need and in affordable housing allocation. This grouping was utilised as a step in the priority in the Local Connection Criterion as it allows those in very similar, often adjacent parishes to be catered for before opening the criteria to district wide. The order of priority is for those within the parish, those in the parish grouping and lastly for those in the district. The addition of such additional criteria is supported by the First Homes legislation in paragraph 008 which states,

“that local authorities and neighbourhood planning groups can apply eligibility criteria in addition to the national criteria described above”.

5. Policy H5’s approach to affordable housing tenure split reflects Steering Group’s priorities for housing (Figure 45) in the introductory text to the Housing Chapter. This aims and objectives table is based on local evidence and the specific evidence from the survey and the Housing Needs Survey, both of which support the 50/50 approach to affordable tenures/social rent.

6. Devon Home choice was contacted to ascertain whether Section 2 could be applied through the Devon Home Choice system for allocating affordable homes. Confirmation that this section was supported and could be applied was confirmed by email as seen in Appendix 34.

Policy H5: New Housing in Broadclyst Parish

Intent Policy H5

To inform the development of new housing on non-allocated sites within Broadclyst Parish.

Policy H5: New Housing in Broadclyst Parish

Exception site mixed affordable and open market housing schemes outside the built-up area boundaries in Broadclyst Parish will be assessed against the provisions of Policy Strategy 35 of the East Devon Local Plan.

Development proposals should include a proportionate and up-to-date housing needs assessment and demonstrate the way in which the proposed housing meets local needs in terms of number of their dwellings, size, and tenure.

Development proposals for housing in the Clyst Valley Regional Park will not be supported other than where they positively contribute towards achieving the objectives of the Park.

Justification Policy H5

1. The allocation of sites for future housing development in the NP maximises the extent to which the local community can influence the type of new development provided over the Plan period, including location. However, even site allocations cannot preclude developer applications on additional sites within the Plan area coming forward. As such, there was support for non-designated residential development to be covered in a policy and included within the housing policies of the Plan. The parish has seen unprecedented growth in recent years and this policy was to ensure that any new houses are in line with community housing needs and aspirations.

2. Policy H5 is to ensure that any new non-allocated sites take into consideration the imbalance of the housing stock and tenure in a housing needs assessment. The allocation of sites for housing in a NP does not guarantee that the sites will be built out. Therefore, this policy is needed to ensure that a mix of housing continues to be implemented on all new sites. The Plan area sits within an area of strategic growth, is well networked and, with the national pressure to build houses, indicates that pressure for local residential development will continue into the Plan period and beyond.

3. The mix of housing requiring more one-and-two-bed properties reflects a trend towards single occupancy or smaller households (e.g. older people, divorcees, married couples without children/dependent children and/or younger people to buy and/ or to let, young professionals and to meet demand for 'starter homes' and aspirations for 'down-sizing' from older residents) with a variety of housing needs, whether it be supported accommodation, houses, flats or apartments. There is recognition that the NP Housing Needs Survey had a five-year shelf life and that after this period there is a need for developers to provide houses in line with an up-to-date Housing Needs Assessment.

4. The Housing Needs Survey of 2017 was largely a representation of Broadclyst Village residents, and this survey was selected to be used for the development of small sites within or adjacent to Broadclyst Village or other communities within the parish up until March 2022. Beyond this time, it is important that more up to date survey data is required to ensure that local housing needs continue to be met. The Housing Needs Survey 2017 gives only a partial picture of the evidence as it reviews the needs of the existing population only, whereas a full Housing Needs Assessment should capture the housing needs of the parish, including future incomers to the parish. Hence, there is a requirement of a Housing Needs Assessment to provide evidence of the mix of house sizes and tenures required for the whole parish.

5. The size of development up to or around 15 was selected as this reflects strategy 35 of the Local Plan, which promotes development of exception mixed market and affordable housing at villages, small towns and outside built up boundaries. This descriptor fits with the nature of sites coming forward within the parish. This number of houses also triggers the requirement for affordable housing, which was a key community requirement for any residential development within the parish.

6. The CVRP is seeking to create a green framework within which development can take place. The recognition of the CVRP within the policy is to support the development of properties within the CVRP, provided that evidence shows how the proposed allocations would align and further the strategic objectives in strategy 10. The process of assessing the proposed allocation against the objectives and for the site to be found in alignment ensures that development accords with the principles set out in strategy 10.

Policy H6: Self-Build

Intent Policy H6

This policy is to support the local evidence need and support for self-build plots within the parish.

Policy H6: Self-Build

Development proposals for single self-build/ custom dwellings within or immediately adjacent to the built-up area boundaries in Broadclyst Parish will be supported.

Proposals for self-build/ custom dwellings will be supported that are within or immediately adjacent to the established communities of Blackhorse, Tithebarn, and Westclyst.

Proposals for self-build/custom dwellings promoted through a community-led mechanism or through a Community Land Trust Scheme will be supported.

Development proposals for housing in the Clyst Valley Regional Park will not be supported other than where they positively contribute towards achieving the objectives of the Park.

Justification Policy H6

1. Interest in self-build was evident in several sections of the HNS. In the section focusing on self-build respondents were asked whether they would be interested in a self-build project either individually or part of a group if a site were available. 35 households showed an interest in one or more types of self-build project.

- 27 households stated they may be interested in an individual self-build project.
- 15 households stated they may be interested in a group self-build project.

Respondents were asked what type of affordable accommodation they would consider moving to. In Figure 50 the HNS Table 8 is provided. Self-build was provided as an attractive tenure.

Shared Ownership	Affordable/ social rent	Affordable self-build	Open market self-build	Discount market	Starter home	Open market
7	6	8	6	5	2	22

Figure 50: HNS Table 8 showing interest in self-build

3. The survey also asked households with a housing need which type of housing they were interested in. The second favoured response was for self-build plots.

4. The Government wants to enable more people to build or commission their own homes and make this a more mainstream housing option. It seems that in Broadclyst Parish there is support to this approach for housing development across the area.

5. In accordance with the Self-build and Custom Housebuilding Act 2015, East Devon has kept a register of interested parties seeking to acquire land to build a home. The register provides information on demand for self-build and custom build in the local area and forms part of the evidence need of demand for this type of building.

6. The register for self-build plots demand in East Devon is presented in the Figure 51. However, this register requirement does not provide any depth of analysis such as:

- Has the need in 2016 been met?
- Is the register of interest culminative? How many are there now waiting for a self-build plot?
- Are the reasons behind why people no longer want to be on the register collected?

Base Period	Number on Part 1	Number on Part 2
30/03/16 - 30/10/16	32	0
31/10/16 - 30/10/17	40	3
31/10/17 - 30/10/19	9	9
31/10/18 - 31/10/19	19	10
31/10/19-30/10/20	13	10

Figure 51: EDDC register for self-build

7. The East Devon register is a register of interest and therefore has limitations with demand and supply being matched. It was noted that the most popular areas for self-build are Woodbury Parish, Exmouth and Budleigh Salterton, yet the present self-build allocations permissions in East Devon is in the Cranbrook Town Plan which requires at least 4% of the expansion areas to be self-build, providing over 150 self-build plots by 2031. Unless people work close to Cranbrook, provision of self-build in a new town does not match the existing popular seaside and village locations by those currently on the register.

8. It is important to note that there is no duty at present on a relevant authority to permission land which specifically meets the requirements expressed by those on the register. However, a NP is a good vehicle to promote this type of development if there is evidence. The community of Broadclyst Parish are in support of self-build both as affordable self-build and open market self-build, and this policy is to support the growth of self-build options within the parish.

The first and second parts of the policy refers to identified settlements and communities. They offer support for infill plots, which are defined as plots in urban, village or settlement settings that take up a gap in the street scene rather than expanding beyond the village and settlement itself, in which the new dwelling is in scale with surrounding properties and/or the settlement concerned. Based on the size of the settlements and or communities concerned, the Plan anticipates that up to three such houses could be developed in each place.

9. The CVRP is seeking to create a green framework within which development can take place. The recognition of the CVRP within the policy is to support the development of self-build properties within the CVRP provided that evidence shows how the proposed allocations would align and further the strategic objectives in strategy 10. The process of assessing the proposed allocation against the objectives and for the site to be found in alignment ensures that development accords with the principles set out in strategy 10.

Policy H7: Development of Live-Work Units

Intent Policy H7

Policy H7 is to support the development of live-work units across the parish.

Policy H7: Development of Live-Work Units

Proposals for the development of live-work units will be supported:

- On brownfield sites,
- In infill plots (as defined in Policy H6),
- For re-use of suitable rural and agricultural buildings, and
- The site allocated in Policy H1.

Development proposals within the wider rural area should not unacceptably impact on the landscape and heritage character of the parish. In addition, their detailed design should ensure that they do not unacceptably impact on the amenities of neighbouring residential properties.

Development proposals for live-work units in the Clyst Valley Regional Park will not be supported other than where they positively contribute towards achieving the objectives of the Park.

Justification Policy H7

1. Sustainability is key to residential development and with the EDDC Climate Change Strategy 2020-2025 target to be carbon neutral by 2040, how we work and live will be scrutinised. The model of living and working from one place will help towards reduced car emissions. The parish community are very aware of traffic and travel issues and reduction in journeys is a highly emotive agenda. The Housing Needs Survey provided key evidence in the recognition of the benefits of live-work units, with respondents asked if they would support the idea of live-work units in the parish.

- 194 households would support live-work units in the parish.

2. Although live-work units were offered as an option and were viewed positively by respondents, the absence of a precedent or practical model is a limiting factor. This is also reflected on property search engines which do not list live-work as a recognised residential model. Live-work units are a new lifestyle concept and have been hampered by the following issues:

- Ratios between workspace and living space.
- Requirement of parking standards.
- Business rates and council tax.
- Gaining a mortgage.

3. With the recent Covid-19 pandemic, many people have been restricted to working from home and adapting to this style of living. The precedent of live-work units is therefore now different to when the HNS 2017 was undertaken. The relevance and value of live-work units as a type of housing has increased value in such times.

4. Utilising existing definitions from rural planning⁸⁷ and Local Plan definitions,⁸⁸ a definition was sought by the Overview Steering Group, so that a live-work unit is a dwelling has to be built specifically to combine a workspace with living quarters. Some live-work policies stipulate percentages of space for living and working under a mixed class use C3 B1 or *sui generis*, but it was decided that a simple definition without percentages and class use would enable this model to come forward and be assessed by EDDC on a case-by-case basis. The community support was strongly

⁸⁷ <https://www.theruralplanningco.co.uk/residential/livework-units/>

⁸⁸ <https://n-somerset-pp.inconsult.uk/consult.ti/david.robins/viewCompoundDoc?partid=126228>

supportive of this model, and it was agreed that it was better for this model to be included and evolve rather than not exist. A definition was selected that was thought to ensure that such a workspace was in addition to living spaces within a house. The need for an external door meant that a specific feature was required for a live-work unit. It might be that a revised stand-alone live-work policy will need to be included when reviewing the NP in the future as it is a varied and evolving development model.

As specified in Policy H1, a live work unit is defined as:

“the provision of a room with an external door (on either floor) that is designated as an office/workspace for those living in the house and is to be in addition to the specified number of bedrooms and bathrooms, any other living rooms including a utility room and, in addition to a garage if included.”

4. Policy H7 is designed to facilitate the appropriate development of live-work units within the parish, to allow a model that is supported by the community to become established. There is also support from the NPPF (2021) for this type of development in rural locations, (paragraph 78) saying that we should,

“be responsive to local circumstances and support housing development that reflect local needs.” (paragraph 84) encourages planning policies that enable *“the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.”*

5. Inclusion of live-work units were well supported by the community prior to Covid-19 as evidenced in the Housing Needs Survey, and with an increased level of support in light of increased levels of home working due to Covid-19. There is not an established definition or any building regulations specifications as to what a live-work unit constitutes. For this Neighbourhood Plan there was a need to provide a definition of a live-work unit as planning permission will be required for this type of development.

6. The arguments for the support of live-work units has been covered in the sections before Policy H1 and H7. As well as recent Covid-19 evidenced requirements, there is also now acceptance that the needs of rural micro businesses cannot be met within or adjoining settlements, communities or in areas well served by public transports but can be met through development of live-work units. As well as new live-work units there was support for dwelling extensions and conversions to provide work unit space to the primary dwelling of the occupant subject to the development being in compliance with design policies.

7. The CVRP is seeking to create a green framework within which development can take place. The recognition of the CVRP within the policy is to support the development of live-work units within the CVRP provided that evidence shows how the proposed allocations would align and further the strategic objectives in strategy 10. The process of assessing the proposed allocation against the objectives and found to be in alignment, ensures that development accords with the principles set out in strategy 10.

5. Infrastructure and Access

Introduction

1. One of the most emotive issues at consultation events and surveys for the Broadclyst Parish NP was that of transport. However, there was confusion over what kinds of transport issues a NP can address. Some transport matters fall within the scope of planning policy, whilst others fall outside.
2. The Plan brings forward new houses and businesses in the parish which will add to the number of vehicles on the roads and congestion issues. In this chapter several policies have been included to encourage a range of active travel infrastructures in recognition that vehicular traffic is a parish wide issue.
3. Transport is not only about vehicular traffic and parking, but also about public transport, pedestrian facilities, cycling and other modes of travel. Indeed, a balanced range of transport options which are less energy demanding and polluting is a key element in making places sustainable, and this is a focus in the chapter.
4. In the NP it is therefore necessary to differentiate between planning and non-planning aspects of transport. The planning aspects are written into policies while the non-planning aspects are to be found in community actions and projects.
5. Locality⁸⁹ provided the examples in Figure 52 below which guided the Infrastructure and Access Steering Group's work:

Examples of transport considerations **relevant to planning** include:

- Ensuring new development has adequate parking and servicing provision. This could include car parking, cycle storage and delivery areas for commercial development.
- Making sure the layout of development allows for pedestrian convenience and safety.
- Ensuring development includes cycle paths.
- Creating easy pedestrian access to public transport facilities in terms of direct and convenient connections.
- Considering whether access arrangements to a site, existing or proposed, are adequate.
- Making sure that local transport capacity is adequate to serve development. This could include consideration of highway capacity, train services, bus services and other modes of transport.

Many traffic matters **fall outside of the scope of planning**.

For example, changes to traffic management on existing transport networks are usually a matter for the highways authority to deal with. So, changes to traffic lights, restrictions, speed limits, signage, traffic circulation, crossing points and other traffic management devices usually fall outside the scope of planning.

Figure 52: Transport considerations for a Neighbourhood Plan

Infrastructure and Access Steering Group Work.

1. The work of the Steering Group was to collate as much evidence and knowledge of the parish infrastructure (both existing and those still to be developed through Strategic Development sites)

⁸⁹Locality provides support to neighbourhood planning groups on behalf of the Ministry for Housing, Communities and Local Government. <https://neighbourhoodplanning.org/toolkits-and-guidance/transport-matters-can-neighbourhood-plan-address/>

and any access issues. This evidence is provided in the Infrastructure and Access Evidence Appendix 11 which covers:

1. Transport infrastructures in Broadclyst Parish:
Roads,
Public Transport,
Rights of Way and
Park and Change facilities.
2. Parish Council Travel Plan
3. Census data: car use/ownership
4. Community survey findings
5. Community Action groups
6. Commissioned Traffic survey findings

2. The findings of the Steering Group centres on Broadclyst residents relying on car transport, which far outstrips other forms and is at odds with local and national transport and access policies. The parish has extensive problems associated with road capacity, volumes of traffic and poor parking provision. Alternatives to driving are inconsistent throughout the parish.

3. Therefore, the focus of the Plan was to encourage and provide a balanced range of active and sustainable travel options and infrastructure, rather than one that is centred on an over-reliance of the car. The policies are centred on:

- enhancing and extending active travel routes and infrastructures throughout and across the parish.
- providing parking for sustainable modes of transport and the inclusion of energy generation.
- encouraging and prioritising lower emission sustainable modes of travel and travel networks.

The community actions and projects are centred on those items listed in Figure 52 that fall outside the scope of policies and land use planning.

National Perspective

1. European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

2. Key messages from the National Planning Policy Framework⁹⁰ (NPPF2021 para 104 and 105) are that 'transport issues' should be considered from the earliest stages of plan-making and development proposals, so that:

- The potential impacts of development on transport networks can be addressed,
- Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised,

⁹⁰ 76 MHCLG (2018) National Planning Policy Framework [online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_2018.pdf

- Opportunities to promote walking, cycling and public transport use are identified and pursued,
- The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account,
- Patterns of movement, streets, parking, and other transport considerations are integral to the design of schemes and contribute to making high quality places,
- ‘Significant development’ should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.’

Local Perspective

1. At the local level, each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008.⁹¹ The Devon and Torbay third Local Transport Plan 2011- 2026 (LTP3)⁹² outlines the transport strategy for the county. Under the Devon and Torbay LTP3, Broadclyst Parish is designated as a ‘Market Town’. The five transport priorities for Market & Coastal Towns and Rural Areas listed within the LTP3 are as follows:

- Assist in supporting existing and future development of the towns;
- Work with the community to demonstrate a low carbon approach to travel;
- Improve accessibility by developing a core bus and rail service supported by community transport;
- Make Devon ‘the place to be naturally active’ through investment in the leisure network; and
- Develop an approach to parking policy which supports the vitality of town centres.

2. In the East Devon Local Plan, policies that relate to the transport theme include:

- Strategy 5B Sustainable Transport.
- Strategy 10 Green Infrastructure in East Devon’s West End.
- Strategy 11. Integrated Transport and Infrastructure provision at East Devon’s West End.
- Strategy 50 Infrastructure delivery.
- Section 26 Transportation and Communications TC2 – TC12.

Strategic Environmental Assessment (SEA)

1. The SEA Scoping Report⁹³ in 2020 focused on the following areas,

⁹¹ Local Transport Act 2008 [online] <http://www.legislation.gov.uk/ukpga/2008/26/contents>

⁹²<https://www.devon.gov.uk/roadsandtransport/traffic-information/transport-planning/devon-and-torbay-local-transport-plan-3-2011-2026/>

⁹³ The SEA for the Broadclyst Neighbourhood Plan Scoping Report (May 2020)
<https://www.broadclyst.org/neighbourhood-plan/neighbourhood-plan-documents?folder=Regulation%2B16%2BDocuments>

- Transportation infrastructure.
- Traffic flows and congestion.
- Accessibility.
- Car ownership.
- Travel to work.

2. For each of these areas in the report baseline data and evidence, key issues and opportunities are provided. The conclusion of each section provides a list objectives and assessment questions. For the Broadclyst NP these are presented in Figure 53.

SEA objective	Assessment questions (will the option/ proposal help to...)
Promote sustainable transport use and active travel opportunities and reduce the need to travel where possible.	<ul style="list-style-type: none"> • Encourage modal shift to more sustainable forms of travel? • Enable sustainable transport infrastructure improvements, particularly for public rights of way and active travel opportunities? • Facilitate working from home and remote working? • Improve road safety? • Reduce congestion?

Figure 53: Proposed SEA objective and assessment questions

Policies

The material provided so far in this chapter and the supporting evidence document (Appendix 11) sets the scene of the issues experienced in Broadclyst Parish. This material provides the justification for the policies within this section of the chapter. The following policies are in recognition that travelling by car and car related issues in the parish needs to change, to lower emissions and to develop infrastructures required to widen active travel choice.

After each policy or group of policies there is a further brief justification section and information on how the policies have been amended in the Regulation 14 process.

Policy T1: New Pedestrian and Cycle routes

Intent Policy T1

To support the development of a new access route from Broadclyst Station to Broadclyst Village.

Policy T1: New Pedestrian and Cycle routes

Development proposals to provide safe and direct access for pedestrians and cyclists between Broadclyst Village and Broadclyst Station will be supported.

Justification Policy T1

1. Present access along Station Road to Broadclyst Station and beyond is via narrow country roads presenting a considerable safety hazard for those travelling by foot or bicycle, given the lack of formal pavement and cycle routes available from Broadclyst Parish.

2. There are a variety of reasons why Station Road has a long history of traffic issues and there is growing concern that these will get worse when the Bluehayes expansion of Cranbrook exits onto Station Road.

Station Road has the following design issues:

- Throughout its length it varies from a single-track road to double. The size of vehicle travelling along it often compromises the two-way flow of traffic.
- The location of a Lodge Trading Estate with distribution and warehousing businesses that focus on deliveries by OSG class 1 and 2 vehicles to the northern end of Broadclyst Station results in traffic queueing and congestion within this settlement.
- The road design being at ninety degrees to the railway bridge limits two-way movement and traffic gets gridlocked here.
- The road has roadside parking and incomplete pavement provision making it difficult for cyclists or pedestrians to move safely along this road.
- There is no cycle or pedestrian provision on the railway bridge, so the present design does not offer a safe route for cyclists or pedestrians.

3. With the development of Cranbrook there are infrastructure change proposals for Broadclyst Station.

- There will be pedestrian and cycle access to Cranbrook Station and to Exeter.
- Station road will be partially closed to access at its southern end including the turn out onto the B3174.
- A new junction will be provided along Station Road and all vehicles, including HGVs travelling south, will be directed through the Cranbrook expansion area to access the B3174.

4. The railway bridge and quality of road provision into and through Broadclyst Village will remain an infrastructure limitation and will have to cope with increased vehicular use from Cranbrook. It is anticipated that Station Road will become a major north-south route for the town of Cranbrook, which will require strategic infrastructure intervention to function safely and effectively.

5. The proposed Clyst Valley cycle route provides a significant opportunity to improve the pedestrian and cycle access from and to Broadclyst Parish to a multitude of destinations. Ideally any such proposals should assist both residents of Broadclyst Station travelling northwards to/from locations such as Clyst Vale Community College, Broadclyst Primary school, Killerton House, Ashclyst Forest and also residents of Broadclyst Village travelling southwards to/from locations such as Cranbrook Town Centre, Cranbrook Train Station, primary schools in Cranbrook and Cranbrook Education Campus. It would also facilitate onward links to the Exeter, Exe Estuary Trail and onwards to the Killerton Estate.

6. The proposed pedestrian and cycling provision along this route would particularly assist with the downgrading or adjustment of this route for active travel providing a safe route for pedestrians and cyclists to Cranbrook, Broadclyst village, Clyst Vale Community College and the proposed Community Sports Hub. Such infrastructure and limiting two-way access along the length of a road has been successfully modelled in Exeter (2020), as a result of Covid-19.

7. The reason for the placement of Policy T1 in the NP is that the community feel very strongly that this proposal will significantly benefit the safety and quality of lives for both the communities of Broadclyst Station and Broadclyst Village, as well as providing a route which would be critical in developing infrastructures to widen transport choices for these communities.

8. Complaints of traffic flow is well documented, and part of the Neighbourhood Plan work has to be work with Devon Highways on options to improve this north-south route. Discussion with EDDC

Cranbrook team officers have also taken place regarding this route and a bridge over the London Waterloo railway line (Policy T2) to facilitate safe active travel.

Policy T2: Pedestrian and Cycle Bridge over the Waterloo Railway Line

Intent Policy T2

To support the development of a bridge for cyclists and pedestrians over the Waterloo - Exeter railway line, to allow residents of the north and centre of Broadclyst Parish safe access to the south of the parish and beyond Broadclyst Station to Cranbrook Town and Cranbrook Railway station.

Policy T2: Pedestrian and Cycle bridge over the Waterloo Railway Line

Development proposals for the provision of a bridge over the Waterloo - Exeter Railway line for cyclists and pedestrians will be supported.

Development proposals should respond positively to the following matters:

- the route to and from the bridge should connect where practicable into the Cranbrook Bluehayes Expansion Area cycle and pedestrian infrastructure;
- the bridge should be within easy walking distance to Cranbrook Railway Station;
- the overall proposal should deliver safe pedestrian and cycle access routes to the bridge from Broadclyst Village;
- the bridge and associated infrastructure must provide safe access;
- the bridge and associated infrastructure should be designed to mitigate impact on adjacent residential properties; and
- the location and design of the bridge should not unacceptably increase the risk of flooding.

Justification Policy T2

1. Lack of swift and safe access to Broadclyst Station, Cranbrook and specifically Cranbrook Train Station was repeatedly highlighted as an aspiration of residents completing the Broadclyst 2016 NP survey.
2. Station Road is the most direct route from Broadclyst Village to Broadclyst Station and onwards to the A30. With the build out of Cranbrook Bluehayes phase this will be an even busier route. This route is unsafe for pedestrians and cyclists. Therefore, to minimise the impact of the Cranbrook western traffic and to satisfy the community's evidenced aspiration, a bridge over the railway is supported by the NP.
3. The benefits of such a development are self-evident. They include reduced traffic congestion for local people by facilitating access to rail and bus at Cranbrook without using cars; the provision of infrastructure which provides an environmentally friendly, reduced carbon emissions options due to reduced vehicular traffic; and the opportunities for a healthier lifestyle by encouraging station access by bicycle and on foot.
4. Such a structure would have significant costs and may only be deliverable as part of any infrastructure enhancement to the rail line (which is included in the Exeter Transport Strategy 2020-2030⁹⁴).

⁹⁴ <https://www.devon.gov.uk/roadsandtransport/traffic-information/transport-planning/innovasump/>

Policy T3: Parking Provision

Intent Policy T3

For parking provision both residential and commercial across the parish to provide for more sustainable modes of transport.

Policy T3. Parking Provision

Development proposals should provide on-site car parking in accordance with parking standards in the Development Plan and which:

- **minimise the visual impact of parking upon the setting;**
- **provide parking areas that have maximum surface permeability;**
- **ensure parking spaces are prioritised for sustainable modes of transport;**
- **provide charging points; and**
- **provide covered facilities for cycles and E-bikes.**

Non-residential developments, including public car parks, Park and Change, and Park and Ride facilities should deliver car parking arrangements which address the following matters:

- **the accessibility of the location.**
- **a mix of rapid, fast and trickle electric charge appropriate to the type of development.**
- **the provision of electric charging points at a minimum of 20% of the public parking spaces except where demonstrably unviable to do so in which case the highest percentage of provision which is viable should be applied.**
- **the provision of a minimum of 50% of the staff designated parking spaces with charging points except where demonstrably unviable to do so in which case the highest percentage of provision which is viable should be applied.**

Development proposals which include parking provision which utilises roofs/ covered areas or ground mounted solar systems to generate renewable energy will be supported, where they do not have an unacceptable impact on the visual amenity of the immediate locality.

Parking provision which generates energy within the parking area for the charging of vehicles, lighting, or heating of adjacent buildings within the parking area will be supported.

Justification Policy T3

1. Delivering a step change in lowering carbon dioxide emissions will require existing development to significantly improve energy efficiency. This policy provides a framework for a variety of changes to improve energy efficiency for both existing and new development. Promotion of charging facilities is supported in paragraph 107e and 112e in the NPPF (2021) which states that residential and non-residential development should,

“ensure an adequate provision of spaces for charging plug in and other ultra-low emissions vehicles”

“be designed to enable charging of plug-in and other ultra-low emissions vehicles in safe, accessible and convenient locations.”

Parking facilities that provide opportunities for energy production as well as encouraging vehicle users to switch to lower emissions and lower pollution modes of transport are supported.

2. Policy T3 also ensures that charging plug-in provision for vehicles bikes and scooters is provided at new commercial and residential properties across the parish. Minimum targets are set for the number of parking spaces with charging facilities in public car parks and for staffed premises; this is to facilitate a significant change in provision for E-bikes, scooters, and cars. Setting of percentages in the policy was to set targets for public and staff parking charging provision. An addition of a viability clause though they compromise effectiveness, is required in order to comply with the basic conditions of neighbourhood planning. The setting of percentages is in line with supporting recent proposals on ceasing the sale of petrol and diesel cars by 2030⁹⁵. This is also in line with DCC and the Cranbrook Plan that all policies on parking should include reference to electric and cycle parking.

3. Parking facilities often cover significant amounts of land, which can be used to generate electricity. This policy ensures that opportunities for energy generation as well as encouraging vehicle users to switch to lower emissions and lower pollution modes of transport are supported.

4. To promote the use of electric vehicles for tackling climate change and working towards a low carbon economy, this policy provides a minimum requirement for provision of charging points. A level of 20% was agreed to be achievable and suitable for public parking spaces without effecting the viability of the development. A viability clause was added to comply with basic conditions.

5. Provision of staff electric vehicle spaces was deliberately set at a higher level of 50% so that workplaces are actively promoting active travel options and infrastructure. It is not 50% of the total staff number but 50% of those staff utilising electric vehicles. This is to ensure that workplaces actively engage with the use of electric vehicles as well as E-bike hire and cycle to work schemes, thus creating a culture change in how people travel to work. A viability clause was added to comply with basic conditions and to recognise that parking space provision does effect viability. It might be that in time this policy will need to be reviewed as most people will be using electric vehicles by the end of the plan period.

Policy T4: Active Travel Infrastructure

Intent Policy T4

To support proposals to extend existing and deliver new routes for use by pedestrians, cyclists. Proposals which would extend and/ or improve routes for active travel across the parish as shown on Figure 54 will be supported.

Policy T4: Active Travel Infrastructure (for commuting and leisure)

Proposals which would extend and / or improve routes for active travel across the parish as shown on Figure 54 will be supported.

Development proposals which would have an unacceptable impact on the routes shown in Figure 54 will not be supported unless acceptable routes are provided.

⁹⁵ <https://www.gov.uk/government/news/government-takes-historic-step-towards-net-zero-with-end-of-sale-of-new-petrol-and-diesel-cars-by-2030>

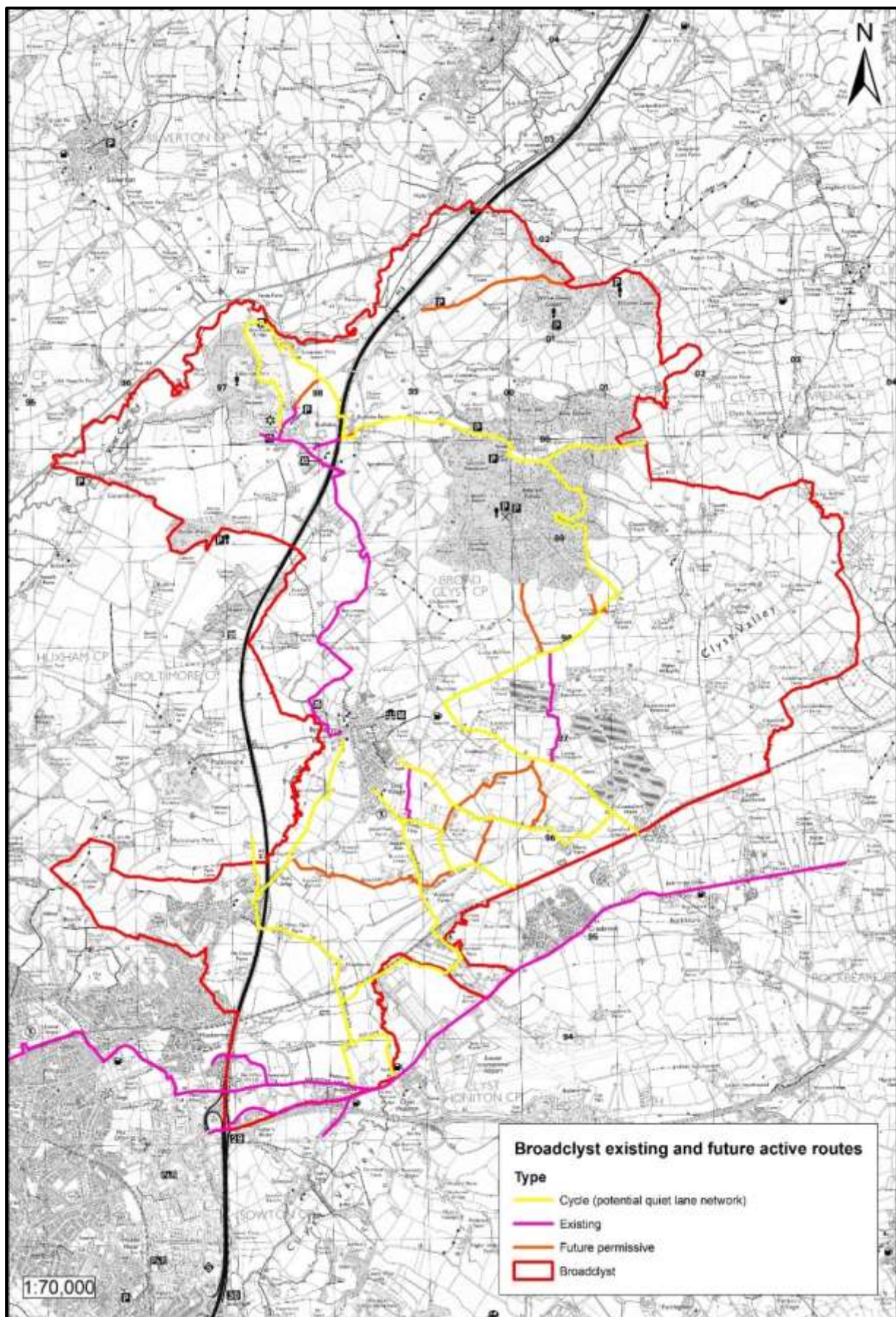


Figure 54: Existing and Future Active Travel Infrastructure in the Parish for commuting and leisure.

Justification Policy T4

1. Initial policies in this section have been car centric with road building and car parking at heart. As road networks are at capacity with impacts of congestion evident, there is a need for more multi modal travel which is more people centric. This policy is in support of active, people-centred travel.
2. Active travel is affordable, delivers significant health benefits, has been shown to improve wellbeing, mitigates congestion, improves air quality, and has no carbon emissions at the point of use.
3. Towns and parishes based around active travel will have happier and healthier citizens as well as lasting local economic benefits. Covid-19 has provided a window of opportunity to act now to embed walking and cycling as part of new long-term commuting habits and reap the associated health, air quality and congestion benefits.
4. Increased development within the Plan area offers the potential to deliver sustainable transport network enhancements, including improved pedestrian and cycle networks. These developments bring opportunities to link with the Clyst Valley Trail, Exe Estuary Trail, and the national cycle network.
5. Such a multi-use network will encourage residents of the local parish and beyond to easily access cycle ways. It will create a network of paths that access local amenities and the countryside offering uninterrupted routes which are safe and direct. It will encourage opportunities to an active, healthy lifestyles on the doorstep and an active travel option to work. Support will be given to proposals for the following multi-use trailroutes across the parish which provide safe access:
 - Onto the Clyst Valley Trail throughout the parish.
 - From Westclyst to Broadclyst Village.
 - From Blackhorse via Mosshayne to Westclyst and beyond.
 - Trails providing off road access to the Killerton Estate sites of Elbury Farm and Silverton Mill.
 - A trail network which links the Killerton Estate sites of Elbury Farm, ~~Silverton~~ Mill, Ashclyst Forest and Killerton House.
 - A trail to provide a quiet route from Crannaford to Ashclyst.

Policy T5: Low Carbon Travel Provision

Intent T5

To develop a low carbon travel network across Broadclyst Parish. This policy is to include all legal forms of electrically and other low carbon assisted two- or three-wheeled vehicles, including bikes and scooters.

Policy T5: Low Carbon Travel Provision

Development proposals which support and expand a low carbon transport network around and through the Parish that are appropriately located and have regard to the contents of Policy D1 of this Plan will be supported.

Justification Policy T5

1. Policy T5 sets out a broader context for low carbon travel. These include the provision of low carbon methods of travel rental and/ or pool vehicle enterprises and associated operational infrastructure, and the delivery of secure locations for combined parking with charging of low carbon

travel options. E-bikes look set to become an important part of functional journeys. E-bikes enable commuting for a greater range of distances, physical abilities, and time constraints. For example, residents of Broadclyst Parish who commute to Exeter, or who travel to Exeter for other reasons, might find that they could do the journey by E-bike almost as fast as by car in present traffic conditions, whereas a non-electric bike would take much longer and be more physically demanding. E-bikes also enable the transport of a range of loads: electrically assisted cargo bikes can be used to transport 2 small children or an equivalent load in shopping or parcels.

2. The sharing of bikes and cars is not a new concept and Co Cars in Exeter runs a scheme which provides bikes, cars, and a cargo bike delivery service. The company is relaunching Co Bikes, Exeter's on-street electric bike scheme. There will be just under 100 bikes rolling out to locations around the city including all existing sites as well new locations including, Pinhoe and the R.D. &E hospital.

3. E-bikes and scooters are also set to become an important part of active leisure. The use of E-bikes and scooters on the emerging network of trails for leisure purposes is to be encouraged. These modes of travel are low carbon, quiet and non-polluting. E-bikes and scooters help to deliver our wider strategies on tourism, recreation, health, and well-being. There are opportunities for enhanced electric linkages to be delivered with the emerging Clyst Valley Trail network and to other cycle networks beyond the parish.

4. Facilities such as rental, parking, charging, signage and other information will encourage the use of E-bikes and scooters on trails, cycleways and roads for both work and leisure journeys.

5. The policy supports other low carbon vehicles in recognition that during the life of the Plan advances in travel technology might supersede today's vehicles.

6. Natural Environment

Introduction

The Natural Environment is an essential part of Broadclyst Parish community life. In the Community Survey (2016)⁹⁶ a key finding was that the natural environment and rural setting are very important to residents. Responses to survey questions 3 and 4 suggest the sense of village community and safety, along with the natural environment and rural landscape, are the most important qualities to local residents.

National Character Area (NCA)

1. Broadclyst Parish lies in National Character Area 148; Devon Redlands (Appendix 22)⁹⁷. Defining characteristics include deep, narrow lanes, gently rolling hills, networks of hedgerows enclosing relatively small grazed or arable fields, trees and small copses giving a wooded appearance, flat bottomed valleys, extensive floodplains, and large arable and grazed fields.

2. More detailed characteristics are provided by the County and District level Character Assessments,⁹⁸ giving a more local perspective. These are provided in the Natural Environment Evidence Document (Appendix 12).

3. Included in Appendix 12 is a detailed breakdown of all the information on what creates the varied landscapes and habitats that make up the parish's natural environment. It is clear that the details in this section are what is so valued by the community and drives their passion to ensure that any development in the parish is done so following specific community led rules and guidelines, that will ensure that development is in keeping and will not impact on the parish's landscapes or habitats. Justification for all the policies in this chapter stem from the data included in Appendix 12, which also includes the following baseline data:

- International Designated sites: 2 within 10k.
- SSSI: Killerton SSSI.
- County Wildlife Sites (CWS): 8 sites.
- Other Sites of Wildlife Interest (OSWI): 5 sites.
- Unconfirmed Wildlife Sites (UWS): 15 sites.
- Trees.
- Ancient Orchards.

⁹⁶<https://www.broadclyst.org/neighbourhood-plan/neighbourhood-plan-documents?folder=Regulation%2B14%2BDocuments%252FAppendices>

⁹⁷ <http://publications.naturalengland.org.uk/publication/6150022>

⁹⁸ <https://www.devon.gov.uk/planning/planning-policies/landscape/devons-landscape-character-assessment>
<https://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/landscape/the-2019-landscape-character-assessment/>

Landscape Characteristics

1. The various levels of character assessment provide a picture of a rural landscape and it is the eight characteristics below that the locals value and seek to be protected for leisure, health, and mental well-being.

1. Landscape crossed by streams and meandering watercourses, with wide floodplains and meadows.
2. Gently rolling landform rising to distinctive ridges, an area which is dissected by narrow lanes, some of which are sunken.
3. Frequent hedgerows often treed creating an extensive network that defines much of the landscape, although the open floodplain has less tree cover.
4. Trees are a dominant feature within the landscape, with higher ground providing views of distinctive wooded skylines.
5. Killerton Park stands out as an important landmark within the landscape, being a distinctive feature in views from much of the parish.
6. Farmed landscape including arable and some pasture, in a mixture of small to medium scale fields, bordered by hedgerows and copses.
7. Countryside providing areas of rich and varied habitats and biodiversity. (Marsh land, rough grassland, flood meadows, traditional orchards, scrub, hedges, low fen, veteran and ancient woodland).
8. Dispersed pattern of settlements/ communities and a strong natural stone and cream coloured vernacular set by the Killerton Estate. Building ages, styles and settlement size vary in areas outside the Estate. New development in Westclyst and Tithebarn have created new urban landscapes.

2. East Devon Strategic Development has allocated land in the parish for both commercial and residential development. These areas are in stark contrast to the character area landscape and are areas where a more urban/ city landscape characteristic dominates.

3. It is the loss of swathes of agricultural land for strategic development combined with a recognition of the climate change emergency that has focused locals' attention on the value and importance of their rural and agricultural landscape.

4. Incremental changes to the landscape structure and loss of locally distinctive features through loss of agricultural land, hedgerows, and trees to development (commercial and residential) has led to change in the intimate scale and historic landscape character within the parish, with the landscapes of Westclyst, Tithebarn and in time, Broadclyst Station changing immeasurably.

5. Sites allocated in the NP provide a range of brownfield and greenfield sites. Sites H1, H2 and H3 are recognised as greenfield sites which are of little agricultural value and are presently laying fallow. However, there is still the recognition that such land is of biodiversity and landscape value. The policies in this chapter are to ensure that such loss is mitigated as much as possible.

National Context

NPPF (2021)⁹⁹

1. Key messages from the National Planning Policy Framework NPPF (2021) include:

⁹⁹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

“Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives.” (Paragraph 8)

‘Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and in

d) minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.” (Paragraph 174)

‘Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value [...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape across local authority boundaries.’ (Paragraph 175)

To protect and enhance biodiversity and geodiversity, plans should:

“Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and to

Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.’ (Paragraph 179 a and b)

Plans should take a proactive approach to mitigating and adapting to climate change, considering the long-term implications for biodiversity.” (Paragraph 153)

2. Within the NPPF (2021), there are sections where the natural environment is highlighted with selection, conservation, enhancement, and protection being advocated. There is clear recognition of the value that the natural environment provides in:

- promoting healthy and safe communities,
- sustainable transport,
- achieving well designed places,
- protecting green belt,
- meeting the challenge of climate change,
- flooding and coastal change, and
- conserving and enhancing the historic environment.

3. The natural environment is the glue that is required to achieve sustainable development. The 25 Year Environmental Plan (2018)¹⁰⁰ and The Biodiversity Strategy 2020¹⁰¹ detailed in Appendix 12 both support the halt of an overall biodiversity loss, healthy well-functioning ecosystems and establishment of coherent networks, with more and better places for nature, for the benefit of wildlife and people. The NPPF (2021) supports the halt of biodiversity loss when it states that planning policies and decisions should be,

“minimising impacts on and providing net gains for biodiversity” (Paragraph 174d)

EDDC: Local Context

1. At the local level, policies in the East Devon Local Plan that relate to the Biodiversity and Geodiversity themes include:

- Strategy 5 – Environment.
- Strategy 6 – Development within Built-Up Area Boundaries.
- Strategy 10 – Green Infrastructure in East Devon’s West End.
- Strategy 38 – Sustainable Design and Construction.
- Strategy 47 – Nature Conservation and Geology.
- D3 – Trees and Development Sites, and
- EN5 – Wildlife Habitats and Features.

2. Section 18 of the EDDC Local Plan covers the outstanding natural, built, and historic environments and contains the strategic policies covering the enhancement, conservation, and development of the natural environment. Section 17 covers climate change and renewable energy policies. Both sections support the policies of the NP.

3. To inform overall works, a mitigation strategy has been produced by East Devon utilizing the South-East Devon European Site Mitigation Strategy Report 2014.¹⁰² The strategy provides a framework to mitigate for the potential in-combination impacts of new housing development on three European wildlife sites within and in the vicinity of East Devon District: the Exe Estuary Special Protection Area (SPA) and Ramsar site, Dawlish Warren Special Area of Conservation (SAC), and the East Devon Pebblebed Heaths SAC/SPA.

4. In July 2019 EDDC declared a Climate Emergency and produced a Climate Change Strategy: 2020 – 25,¹⁰³ setting the target to reduce carbon emissions annually and to be carbon neutral by 2040.

¹⁰⁰

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

¹⁰¹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf

¹⁰²[https://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/biodiversity/southeast-devon-european-site-mitigation-strategy-report-\(2014\)-Footprint-Ecology](https://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/biodiversity/southeast-devon-european-site-mitigation-strategy-report-(2014)-Footprint-Ecology)

¹⁰³ <https://democracy.eastdevon.gov.uk/documents/s7944/EDDC%20Climate%20Change%20Strategy.pdf>

5. At the local level, the East Devon Climate Change Strategy (2020- 2025) sets out the following vision for the district: 'To become a carbon neutral council working within a low carbon economy and lifestyle, reflected in our travel, homes, businesses, visitor experiences and communities.' Other key priorities include:

- Increase resilience to climate change to maintain East Devon as a safe and healthy place to live, work and visit.
- Enable reductions in greenhouse gas emissions from energy consumption in homes, transport and businesses in East Devon.
- Enable the development of secure supplies of renewable and low carbon energy for individuals, communities, business and industry.
- Support new development which seeks to minimise additional associated greenhouse gas emissions.
- Contribute towards developing the low carbon economy.

Key policies in the East Devon Local Plan that relate to Climate Change include:

- Strategy 3 – Sustainable Development;
- Strategy 5 – Environment; and
- Strategy 38 – Sustainable Design and Construction.

Killerton Setting Study¹⁰⁴

1. The National Trust commissioned LUC in 2013 to prepare the Killerton Setting Study alongside a Parkland Management Plan in order to understand the contribution of the setting to the significance of Killerton Park and to explore its sensitivity to change. The study indicated that the setting of Killerton has been greatly influenced over time by increasing population, industrial and housing development, and changing agricultural land use and management. Five forces for change that could potentially affect the setting of Killerton Park were considered, as follows:

1. Residential and employment development (housing and industry);
2. Infrastructure development (road, rail, aircraft routes and energy generation or transmission telecommunications);
3. Incremental development (generally small scale-built developments);
4. Land cover change (change in agricultural land use or forestry management);
5. Recreational pressure (public access by car, cycle or on foot).

2. The study split the Killerton Estate into six landscape character types, and each character area was examined to determine the likely extent of detrimental influence for each of the five factors listed above. A summary sensitivity table of scores and forces for change were presented for each landscape area.

3. The Strategic Environmental Assessment scoping report summarized the potential impact of future development (residential and employment) and supporting infrastructure on the Killerton setting in the following manner:

¹⁰⁴ LUC(2012): 'Killerton Setting Study' [online] available from: <https://www.broadclyst.org/neighbourhood-plan/neighbourhood-plan-documents?folder=Reference%2BDocuments&start=10>

- Visual impact through creating urbanised or industrial blocks of land use within the predominantly rural character of the landscape.
- Night time light pollution from large areas of development.
- Perceptual impact beyond direct visual changes, such as the change of residents' understanding of the historical setting of the Park within a large rural estate and small nucleated villages.

4. The Killerton Estate is looking at developing visitor hubs across the parish which will alleviate pressure on the Killerton House and Park. The provision of alternative visitor hubs will enable visitor numbers to be dispersed across the parish rather than at Killerton Park which is the only visitor centre available today.

Strategic Environment Assessment (SEA)

1. A SEA scoping report was carried out in 2020 for the Broadclyst Parish NP. In this document the following chapters

- Biodiversity
- Climate change
- Landscape
- Land soil and water Resources

provided rich data and set out key issues and opportunities. Each chapter ends with an objective and questions on options and proposals for policy writing. The biodiversity chapter last section is presented in Figure 55.

Biodiversity theme
Objective: Protect and enhance all biodiversity and ecological connections within and surrounding the Neighbourhood Plan area.
Questions: option/ proposal <ul style="list-style-type: none"> • Support the protection of the Killerton Park SSSI? • Protect and enhance the integrity of the County Wildlife Sites within the Plan area, including supporting habitats and mobile species that are important to the integrity of the site? • Protect and enhance developmental control species of identified ecological value? • Protect and enhance priority habitats and species, particularly the extensive areas of natural woodland and orchards? • Achieve a net gain in biodiversity? • Support enhancements to multifunctional green infrastructure networks?

Figure 55: SEA scoping report Biodiversity objective(s) and assessment questions:

This information provided a useful check list of what the Broadclyst Parish NP had or had not covered within its Natural Environment Policies.

2. A SEA Scoping Report and a SEA Report were produced for Regulation 14 and a third SEA (Appendix 5) was submitted at Regulation 16 to ensure that changes post Regulation 14 were acknowledged in an updated document.

Community Consultation

Survey 2016.

1. In the Community Survey (20126) 6 of 15 questions were related to the Broadclyst natural environment. Question 3 asked respondents to provide three short or single word descriptions of

how they would like the parish to be described in twenty years' time. 'Rural' and 'green' were two of the most common words used. Question 4 asked respondents to rank seven qualities for the parish. The sense of community and safety, along with the natural environment were found to be the most important qualities to local residents.

Questions 5 - 7 focused on trees, hedgerows, orchards, and other natural habitats, with Question 15 asking for additional comments on the parish. These more open-ended questions provided appendices of data relating to the natural environment.

Question 5 in the Community Survey (2016) asked for named locations of trees, hedgerows, orchards, or other natural habitats that should be protected within the Plan. The list of suggestions is in Appendix A of the survey. (Appendix 2).

Question 6 asked: if more trees, hedgerows, orchards, or other natural habitats should be encouraged through the Neighbourhood Plan. The level of support was high resulting in 93% 'Yes' and 7% 'No'.

Question 7 asked for suggested locations as to where new trees, hedgerows, orchards, and natural habitats should go. The suggestions are included in Appendix B of the survey. (Appendix 2).

2. The strength of support for Question 5 - 7 shows that residents are keen to see trees, hedgerows and natural habitats preserved and for more to be planted wherever possible. Details from Appendices A and B of the survey were utilized to identify sites for local green space allocation.

Broadclyst Neighbourhood Plan Sites Consultation

1. Using survey data, community consultation information and evidence from the Natural Environment Steering Groups, natural environment sites from across the parish were selected and prepared for inclusion in the First Community Consultation (2019) event. It was decided that woodland and local green sites would be separately presented in the Consultation Event with a banner for each (see Figure 56) and assessed on different pages in the feedback form.

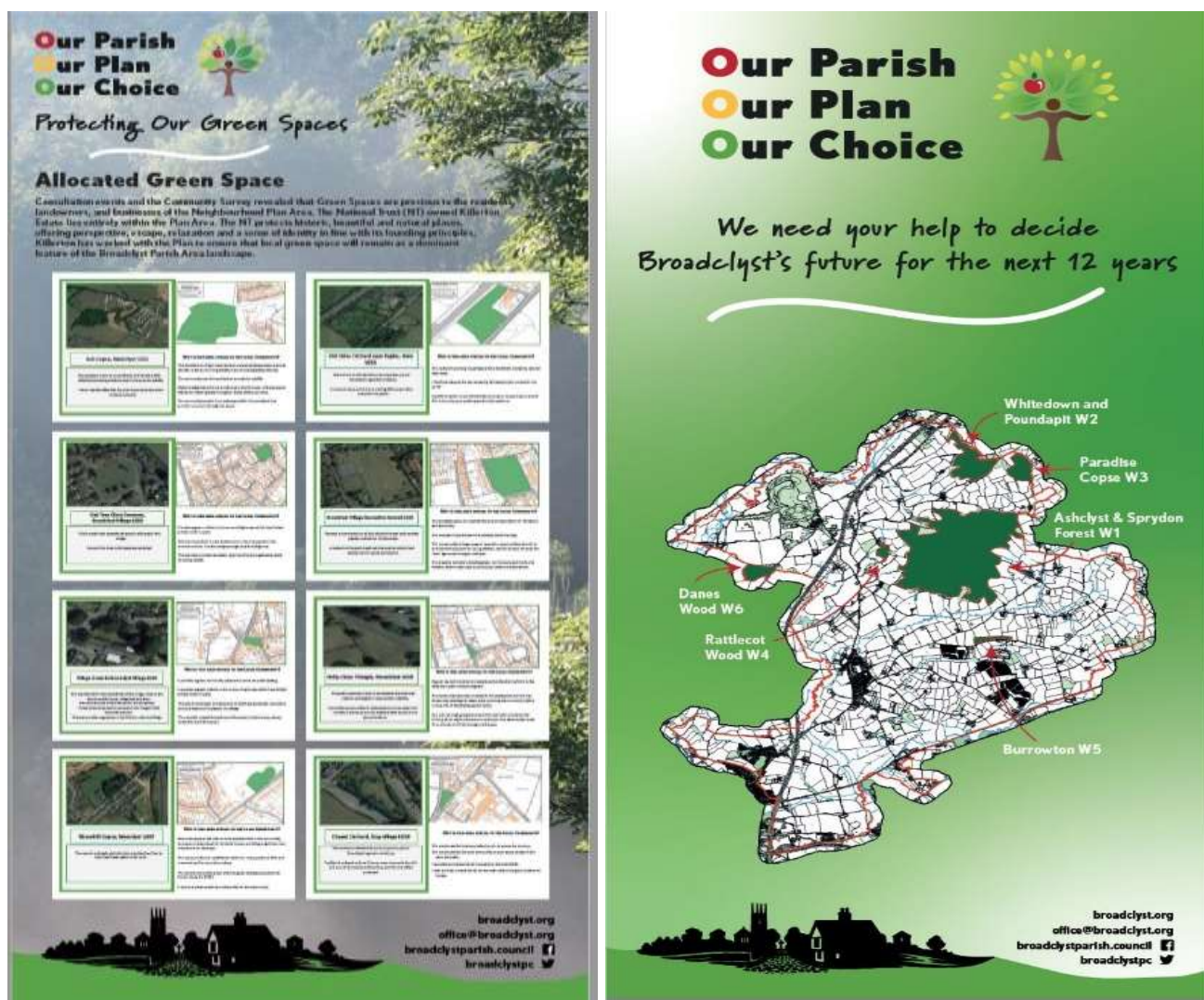


Figure 56: Local Green Space and Woodland Banners in the First Sites Consultation.

2. The consultation of sites is explained in full in the Consultation Document. Results from the community consultation revealed overwhelming support, with above 94% of the responders voting in favour of all the local green sites and the six woodlands. (See Appendix 7).

3. The sites consultation also included sites for housing, commercial space, mixed development, and a community sports hub. It was noted that the feedback form consistently included comments on the need to ensure that all types of development did not detrimentally affect the landscape setting and should provide net gains in biodiversity and in tackling climate change.

Future of the Broadclyst Parish Natural Environment

1. Growth in the parish and in the surrounding parts of East Devon will place increased pressures on, and destruction of, the natural environment within the parish. Habitats and species will face increasing pressures from future development within the Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitat and impacts on biodiversity networks, which may be exacerbated by the effects of climate change, with the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.
2. County Wildlife Sites act as wildlife corridors and have the potential to be impacted by new development, which can remove the connection between habitats for species such as birds. Ecological sites can also be impacted by poor air quality and water quality, and factors such as noise and lighting can disturb vulnerable species.
3. The NP presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats and species, and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance priority habitats, but to maintain the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment, and infrastructure to ensure that opportunities to improve green infrastructure and wildlife corridors are taken in order to achieve net biodiversity gains in the Plan area.
4. Due to the prevalence of Grade 1 and Grade 2 agricultural land within the undeveloped sections of the NP area, new developments which are located outside of Broadclyst Village will likely lead to losses of higher quality (best and most versatile) agricultural land. The NP presents an opportunity to minimise the loss of high-quality land and to place conditions on any proposed development to result in a net gain of biodiversity.
5. Broadclyst Parish has an extensive river and stream network distributed through narrow localised ribbons leading to the river network. This results in extensive surface water flooding in the Plan area. Climate change and increased development will mean that the NP area will need to increase the resilience of the natural environment to the potential effects of both river flooding (fluvial) and surface water flooding.
6. New development, including infrastructure development, has the potential to lead to incremental changes in landscape quality in and around the NP area and the Killerton setting. In particular, development has the potential to disrupt existing dispersed community patterns within the Plan area. This could also include the loss of landscape features, visual impact on existing features, and loss of tranquility. However, new development also has the potential to support landscape character through regeneration and development, including within the setting of the Killerton Estate, which enhances the rural setting, delivering green infrastructure improvements and new recreational opportunities, and enhanced framing of key views.
7. The policies presented in the next section are to highlight and bring positive benefits for the natural environment within the Broadclyst Parish that the community care passionately about. The policies also link to climate change and the importance of the natural environment and green infrastructure in climate change mitigation.

Policies

The material provided so far in this chapter and the supporting evidence document (Appendix 12) sets the scene of the community values, needs and issues experienced in relation to the natural environment of Broadclyst Parish. This material provides the justification for the policies within this section of the chapter. After each policy or group of policies there is a further brief justification section and where appropriate, information on how the policies have been amended in the NP process.

Policy NE1: Protecting Woodland

Intent NE1

To protect and enhance woodland within the Parish.

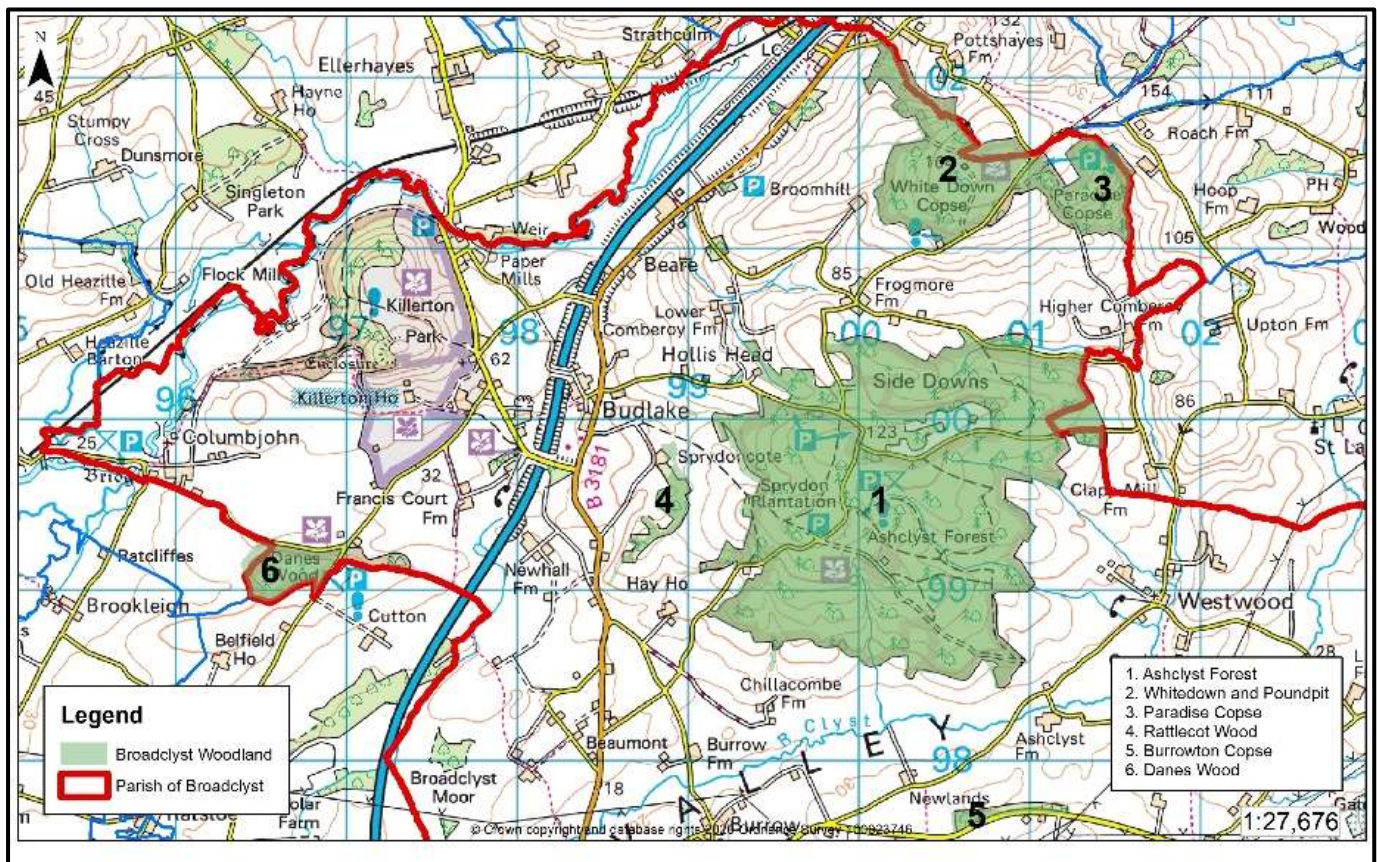


Figure 57: Woodland in the Parish in Policy NE1

Policy NE1: Protecting Woodland

- A. Woodlands 1- 6 in Figure 57 are highly valued by the community. Proposals for development of woodlands 1, 2, 3 & 6 to create or enhance public access and use will be supported.**
- 1. Ashclyst Forest.**
 - 2. Whitedown and Poundpit**
 - 3. Paradise Copse.**
 - 4. Rattlecot Wood.**
 - 5. Burrowton Copse.**
 - 6. Danes Wood.**
- B. Proposals that result in loss or damage to ancient woodland in the parish including veteran trees will not be permitted except in exceptional circumstances in accordance with NPPF (2021) paragraph 180c.**
- C. In woodlands where veteran trees are not impacted, development proposals that would result in the loss, damage, or deterioration of such woodland will not be permitted unless an appropriate replacement planting (NE3), together with a method statement for the ongoing care and maintenance of that planting is agreed.**

Justification Policy NE1

1. The Community Survey provided ample evidence of the importance and value of the woodlands to parishioners. Woodland areas were listed in the comments section of the survey and the value of woodland was also collated. The comments as to the woodlands value ranged from: woodlands are important environmentally e.g. as carbon sinks, air pollution filters, provision of habitats; socially for the provision of wellbeing, aesthetics, and function as buffer zones; and economically, through to the provision of sustainable products e.g. timber and wood fuel. The areas of woodland listed in Policy NE1 were selected from the survey and their inclusion was based on those woodland that the community saw as important natural features that contribute positively to the landscape character, habitats, and amenity of the parish. In the Community Sites Consultation, six woodland sites were presented for the community to vote and comment on. Results from the community consultation revealed overwhelming support, with above 94% of the responders voting in favour of all the six woodland sites. (See Appendix 7).

2. Selection and support of woodland for Policy NE1 is justified in a variety of ways. For the community a great number of these woodlands provide locally important viewpoints, contributing to the sense of place and amenity of the NP area. Both Ashclyst Forest and Killerton are striking ridge woodlands creating a dominant landscape feature.

3. The woodlands are also seen as important in the protection and enhancement of priority habitats and species, and provide the Country Wildlife sites within the Plan area. Such woodland provides and supports the multifunctional green infrastructure networks within the parish.

4. Trees and woodlands dominate the skyline throughout the parish and provide the most recognised back drop within the parish. Community recognition of woodland goes far deeper than providing a landscape setting. Trees and woodland are also appreciated by the community for providing both human and environmental benefits listed below:

- Places for Recreation and Leisure.
- Wildlife corridors.
- Visual and noise Buffers.

- Commercial revenues.
- Flood alleviation.
- Mental health and well-being.
- Physical exercise.
- Creating a sense of place.
- Creating conditions for economic success.
- Combating climate change.
- Help sequester carbon dioxide.
- Enriching biodiversity.

5. The value of trees voiced by the community are supported by organisations such as Forestry England,¹⁰⁵ the Woodland Trust,¹⁰⁶ the Government's Woodland Carbon Guarantee Scheme,¹⁰⁷ and more locally by the Clyst Valley Regional Park Masterplan.¹⁰⁸

6. The Community felt strongly that development proposals that cause the loss of, or damage to trees and woodland, which contribute positively to the character and amenity of the area, must provide for appropriate replacement planting. It was considered that if replacement cannot be on site that there should be tree replacement sites allocated throughout the parish. Replacement planting in the parish could support tree replacement in ancient orchards, flood planting schemes and the planting of new species that would support Emergency Climate Change. Areas for replanting were suggested in question 7 of the Community Survey (Appendix 7) and are listed in Appendix B.65. The community is aware that within the parish lie ancient woodland, ancient and veteran trees, which are recognised within the policy. The policy is in accordance with NPPF (2021) paragraph 180c) which states that,

“development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists;”

Policy NE2: Green Corridors

1. There are different types of green corridors that have been considered in the Neighbourhood Plan these are:

Biodiversity Corridors

These are areas of ecological importance that provide habitat links with an urban area (may or may not be publicly accessible).

Copses, woodland, trees, shrubs, and hedges

These are areas with continuous tree/shrub canopy and hedgerows that provide habitat for wildlife. These areas can be in the open countryside and within the built-up area including gardens.

¹⁰⁵ <https://www.forestryengland.uk/growing-the-nations-forests>

¹⁰⁶ <https://www.woodlandtrust.org.uk/plant-trees/advice/>

¹⁰⁷ <https://www.gov.uk/government/news/government-launches-new-scheme-to-boost-tree-planting>

¹⁰⁸ <https://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/clyst-valley-regional-park-masterplan/>

Off road routes

Off road routes connect both people and wildlife to open spaces and other destinations. These areas are traffic free routes for shared use.

2. Each type of green corridor provides a rich landscape and habitat. Incorporating green corridors into development proposals can enhance the quality of a proposal, reduce the impact on the local area, improve habitat connections for biodiversity and create quality links between new and existing development and the countryside. It is for these reasons that green corridors have been selected for protection, enhancement, and development in the NP.

3. Community Project 12: to identify and/ or to enhance green corridors (potential joint work with CVRP), has also been included in the NP to extend such features across the parish. Identification of green corridors needs to include an understanding of existing open space provision in terms of location, the role it has in the community and how development in the future may impact an area.

Intent Policy NE2

To protect and enhance green corridors.

Policy NE2: Green Corridors

Development proposals should respond positively to the green corridors across the neighbourhood area. Where appropriate ecological and landscaping mitigation measures should be incorporated to safeguard the green corridor concerned.

The following woodland areas in Figures 58-61 are designated as green corridors.

- 1. Moonhill Copse (Westclyst).**
- 2. Ash Copse (Westclyst).**

Development proposals that would result in the loss, damage, or deterioration of these green corridors will not be supported.

Development proposals which enhance these green corridors will be supported where they create or enhance public access without unacceptable damage to the green corridor.

Justification Policy NE2

1. This Policy is to embrace all types of green corridors which provides a rich landscape and habitat, and to ensure they are incorporated into development proposals to enhance the quality of a proposal, reduce the impact on the local area, improve habitat connections for biodiversity and create quality links between new and existing development and the countryside.

2. Also within this policy two areas of woodland that are not “corridor like” in layout, but lie close to or within a residential area, have been identified as green corridors by the community for protection and enhancement. Within the built-up residential area of Westclyst, two green corridors were identified by the community and regarded as important features in a predominantly urban landscape. These two corridors were valued by the community in very specific ways and both were supported by over 95% of people in the Community Sites Consultation (2019). In the following section the two identified green corridors are explained and justified.

Inclusion in the policy to reference the 25-year Environment Plan was as a result of feedback from the Environment Agency in regard to Regulation 14 who stated that,

“We would support the policy encouraging that any loss is not only compensated for, but also that a net gain is sought in line with the Government’s 25 Year Environment Plan. ”

Moonhill Copse

1. Moonhill Copse, as seen in Figure 58 and 59, is a small woodland alongside the B3181 which at present has a green field behind it. However, the field is part of a live planning application offering further residential development. This woodland site was referenced in the Community Survey as well as the Sites Consultation as an important green corridor site for Westclyst for the following reasons.



Figure 58: Aerial shot of Moonhill Copse



Figure 59: Moonhill Copse Woodland with linking wildlife corridors extending to / from it (arrowed).

a) The space is a well-defined, integral component within an urban area of existing and new residential development. It has a strong visual connection, and several of the trees have Tree Protection Orders (TPO's). TPOs make the felling, lopping, topping, uprooting, or otherwise willful damaging of trees without the permission of the local planning authority a legal offence, with different TPOs having different degrees of protection. Woodland is a key component of the parish landscape, and this is the only woodland in this residential sector. The EDDC TPO map (Appendix 24) shows this woodland and the extent of trees and woodland under TPO legislation in the parish.

b) This green corridor supports many species of birds and mammals, and the site has an active rookery. It provides a natural wildlife habitat with woodland biodiversity and links as a wildlife corridor to another green corridor that runs along the Poltimore road.

c) This green corridor is valued as a visual green landscape feature as it provides an attractive setting to the residential dwellings that surround it. It also provides a green frontage to properties along the B3181 and Parkside. It provides an attractive wooded skyline for those houses which lie on contours below the woodland.

Ash Copse

1. Another woodland in the Westclyst area is Ash Copse, seen in Figure 60 and 61. This woodland is also valued as a dominant green corridor in the landscape, and it provides an area of woodland biodiversity and a haven for wildlife, including deer. Ash Copse has the added value in that it is in an elevated position which means that this green corridor is appreciated visually by housing both near and far in a residential development area. This corridor links effectively with the stream and green space that has been designed into the urban development, thus providing an ongoing green corridor for wildlife. The satellite pictures show how the woodland corridor interconnects into the residential development.



Figure 60: Aerial shot of Ash Copse showing trees corridor continuing within the residential development.



Figure 61: Ash Copse provides a green corridor and connectivity (arrowed) with the residential development.

2. Protection of these two sites ensures that this habitat is not displaced or destroyed, rendering entire habitats functionally unable to support the species present, which in turn results in biodiversity reduction or loss. These corridors act as a rich habitat which allows species and habitats movement as well as providing visual benefits known to positively affect community mental health levels.

Policy NE3: Tree Replacement

Intent Policy NE3

To replace trees to enhance woodland and the tree coverage across the parish.

Policy NE3: Tree Replacement

Development proposals should be designed in a way which would safeguard trees which have ecological or amenity value or which contribute positively to local landscape character and incorporate them sensitively within their layouts.

Where the loss of trees which have ecological or amenity value is unavoidable development proposals should include a tree replacement scheme.

Justification Policy NE3

1. Trees are a strong feature of the parish landscape (Appendix 12) and are of value to the community for a variety of reasons as well as their role in the reduction of greenhouse gas emissions. The community supports trees and woodland areas and are in favour of a robust policy requiring a tree replacement scheme to achieve parish wide benefits. There is recognition that replacement trees at the following locations and/ or for the following purposes:

- Landscape buffers.
- Noise buffers.
- Shelter belts.
- Wildlife corridors.
- Street trees.
- Beside rivers to create and or enhance natural flood management.
- In or for the creation of community woodlands and orchards, and
- In existing orchards to enhance restoration and extension.

will enhance both the natural and built landscapes and help to mitigate climate change.

2. Tree planting and replanting through this policy will also provide a net gain in biodiversity and in tree canopy cover as well as gains in native biodiversity if native species are planted. The second part of the policy comments about circumstances where the loss of trees is unavoidable. In these circumstances the required tree replacement scheme should be based on the three following principles.

1. An obligation to replace trees according to the Devon 3/2/1/ formula: at least 3 new trees for loss of a large tree, 2 for a medium tree and 1 for a small tree utilising the TDAG¹⁰⁹ tree size specification.
2. Planting: in those instances where the replacement trees will not be planted on the same site as the trees removed, the trees are to be planted for both biodiversity value and community benefits, such as:
 - For the regeneration and extension of orchards, in particular cider orchards lost post 1945.

¹⁰⁹ <https://www.tdag.org.uk/>

- For the creation and enhancement of green corridors.
- For the creation of noise buffers.
- For the creation and enhancement of shelter belts.
- For the creation and enhancement of wildlife corridors.
- In or for the creation and enhancement of community woodlands and orchards,
- Along streets and in carparks to create and enhance streetscape, and
- Beside rivers to create and or enhance natural flood management.

3. To include details on:

- The locally characteristic species of replacement tree to be planted with suitable species, generally of similar expected mature size to those to be removed, and
- An ongoing care and maintenance regime which includes details of responsibility.

3. Comments from consultation and suggested amendments by EDDC, Forestry England and AECOM have been addressed with the following being added to the policy:

- Referencing TDAG.
- Correct use of term ancient woodland and /or veteran trees and alignment with NPPF (2021).
- Addition of historic orchards lost post-1945.

4. The value of trees and woodland canopies is much recognised and the public awareness of the role of trees has greatly increased over the span on the Plan 2003–2022. The local community have been closely involved in the Killerton Estates vision and goal to plant new trees as part of the National Trusts Environmental pledge to plant 20 million new trees by 2030. On the Killerton Estate the plan is to plant 202 hectares of woodland, 50 hectares of wood pasture and parkland, and 44 hectares of traditional orchard. Such high level of local awareness has resulted in the development and support for Policy NE3. Such a policy directly referencing tree planting is supported NPPF (2021) 180c, Forestry England,¹¹⁰ and the Woodland Trust¹¹¹ on the benefits of and approach to tree planting strategies. The Governments Woodland Carbon Guarantee Scheme¹¹² is also relevant.

Policy NE4: The Protection and Enhancement of Hedgerows

Intent Policy NE4

To protect and enhance hedgerows across the parish.

Policy NE4: The Protection and Enhancement of Hedgerows

Proposals to create new hedgerows and hedgerows that link with valuable wildlife sites will be supported.

Where the removal of all or part of a hedgerow is unavoidable, the development proposal concerned should provide a proportionate level of replacement planting with native trees and hedgerow appropriate to the site.

¹¹⁰ <https://www.forestryengland.uk/growing-the-nations-forests> as a starting point

¹¹¹ <https://www.woodlandtrust.org.uk/plant-trees/advice/>

¹¹² <https://www.gov.uk/government/news/government-launches-new-scheme-to-boost-tree-planting>

1. Hedgerows are the unsung heroes of our countryside. They have been a defining feature for over a thousand years, bringing landscapes to life with character and beauty. Residents of Broadclyst Parish identified hedgerows as a distinctive landscape character of the parish and this policy is to ensure that these are protected and enhanced. More recently awareness of the value of hedgerows has been triggered by the environmental pledges of the National Trust, with the Killerton Estate Plan committed to provide 27 kilometres of new/ restored hedgerows across the parish. The local practice of hedgerow restoration and the climate change agenda has meant that demand for this policy by the community was clearly vocalised and has subsequently resulted in the community wholeheartedly supporting this policy.

2. Hedgerows are vital for wildlife. They connect habitats and provide pathways, shelter, and sustenance for wildlife, while protecting the soil, cleaning the air, and absorbing carbon emissions. They are nature's key workers. They provide foraging lines for bats, shelter for small mammals and amphibians that are moving through the landscape, and are a great food source for insects, birds and many other animals. Existing hedgerows should be protected in the first instance, enhanced wherever possible and managed in a sensitive fashion.

3. Hedgerows might not always have a high biodiversity value, but as a strip of green they are invaluable in their role of linking sites and are often the only link between two very valuable wildlife sites. Enhancement and development of hedgerows will therefore serve to extend this important connectivity function.

4. The findings of a study by Holden et al (2019)¹¹³ demonstrated that soils under hedgerows, which should be conserved, can provide important functions on farmland including storing organic carbon, promoting infiltration, and storing runoff, increasing earthworm diversity and hosting distinct fungi communities. The extension of hedgerows would therefore enhance local carbon storing capacity.

5. The Hedgerows Regulations 1997¹¹⁴ 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. The community are keen for a level of protection to be applied that is below the present 20m legislation, this is to ensure that hedgerows remain as active wildlife corridors and are highlighted in the planning system in Broadclyst Parish.

6. Garden hedges are not affected by Hedgerows Regulations 1997 but are recognised by the community as important wildlife corridors and as areas of biodiversity. The inclusion of the development and enhancement of garden hedges within the policy is supported.

¹¹³ <https://www.sciencedirect.com/science/article/abs/pii/S0167880918304894>

¹¹⁴ The Hedgerow Regulations 1997 <https://www.legislation.gov.uk/uksi/1997/1160/contents/made>

Policy NE5: Landscape and Biodiversity

Intent Policy NE5

To protect and maintain Broadclyst Parish's' unique natural environment of diverse habitats and biodiversity.

Policy NE5: Landscape and Biodiversity

As appropriate to their scale, nature and location development proposals should contribute to a high quality and biodiversity-rich natural environment by demonstrating how the following matters are to be addressed:

- a) Retaining and enhancing the existing 8 landscape characteristics (p140-141) which contribute to the visual richness of the landscape and provide important habitats for wildlife. Where significant impacts on one or more of the characteristics is unavoidable, the creation of new planting/habitat creation of equal landscape and visual amenity value should be provided.**
- b) Using locally distinct landscaping and boundary treatments. Preference should be given to native plants species, unless non-native species provide greater biodiversity and habitat net gain.**
- c) Responding positively to the surrounding landscape setting, by being designed and having appropriate regard to the East Devon and Blackdown Hills Landscape Character Assessment (2019) and relevant Devon Landscape Character Area Assessments.**
- d) Requiring biodiversity gains of at least 10% on all development (exemptions: extensions and alterations) and a requirement that developers use the Defra biodiversity net gain metric to calculate the impact of their proposals. Provision of wildlife travel corridors (e.g., bats, hedgehogs, badgers) enabling movement across roads and gardens are supported as a means of achieving a biodiversity gain. Biodiversity gain to extend to a gain rather than a loss of woodland canopy cover.**
- e) Early on-site ecological surveys and evaluation at identified Unconfirmed Wildlife Sites to ensure an appropriate mitigation strategy where appropriate.**

Justification Policy NE5

1. The purpose of Policy NE5 is to ensure awareness and protection and enhancement of the parish's eight landscape characters. Development proposals located along the village edges or within the surrounding rural countryside should carefully consider and respond positively to the unique qualities and characteristics of their immediate landscape setting, as set out within East Devon's 'Landscape Character Assessment and Management Guidelines (LCA & MG) for East Devon' (2008).

2. Protection of local European Designated Sites will continue to be ensured through EDLP (2013-2031) strategy 47 'Nature Conservation and Geology' and, where mitigation measures are required, these will be designed in accordance with the South-East Devon European Site Mitigation Strategy (2014).

3. Broadclyst Parish occupies a unique strategic position within East Devon, which has attracted significant development pressures on the village and its wider setting. However, the Killerton Estate ensures that a large amount of land within the parish still enjoys a pleasingly rural and open landscape setting. This rural landscape forms an intrinsic part of the character and setting of the parish and provides informal and formal recreational opportunities for the community and visitors

alike. There are swathes of land where agriculture monoculture dominate, resulting in areas poor in terms of diversity and this is to be recognised in the net biodiversity gain of development sites close to the monoculture areas.

4. Some character landscapes helps to counter the more urban influences of intensively developed sites such as the Science Park, Westclyst and Tithebarn developments and the expansion of both Cranbrook and Exeter right up to the parish borders, which provide no separation or coalescence strip for the parish. EDDC state that it is important that open land between settlements is retained, thus helping them maintain their separate identities, their landscape setting and to avoid the creation of unrelieved development. (6.24) The policy is written to ensure that land and habitats outside the Killerton Estate (which has levels of protection in place) are protected and enhanced.

6. In addition to protecting the visual quality of Broadclyst Parish's landscape setting, Policy NE5 also seeks to recognise the importance of the village's wider countryside setting, by providing opportunities for wildlife to breed, forage and shelter throughout the Plan area. It encourages the retention and enhancement of existing habitats, and the creation of new habitats at all scales of development, from extensive wildlife corridors to more modest, low-cost interventions such as bat, bird and invertebrate boxes. These can either be incorporated into the design of new buildings, or retrofitted to the outside of buildings, trees, and other suitable structures.

7. In the policy a requirement to achieve a net biodiversity gain of 10%, which is in accord with national planning policy, has been adopted so net biodiversity gain underpins all development within the parish. Included in this section is reference to woodland canopy cover so that woodland is not lost to be replaced by other valuable habitats, such as wildflower meadows, which would lead to a net deforestation. The Woodland Trust¹¹⁵ sets high standards to ensure that all development land includes a minimum of 30% tree canopy cover. This level of cover is not adopted in the policy but a gain in canopy cover is a requirement.

Policy NE6: Local Green Spaces

Intent Policy NE6

Policy NE6 seeks to protect important local green spaces from inappropriate development.

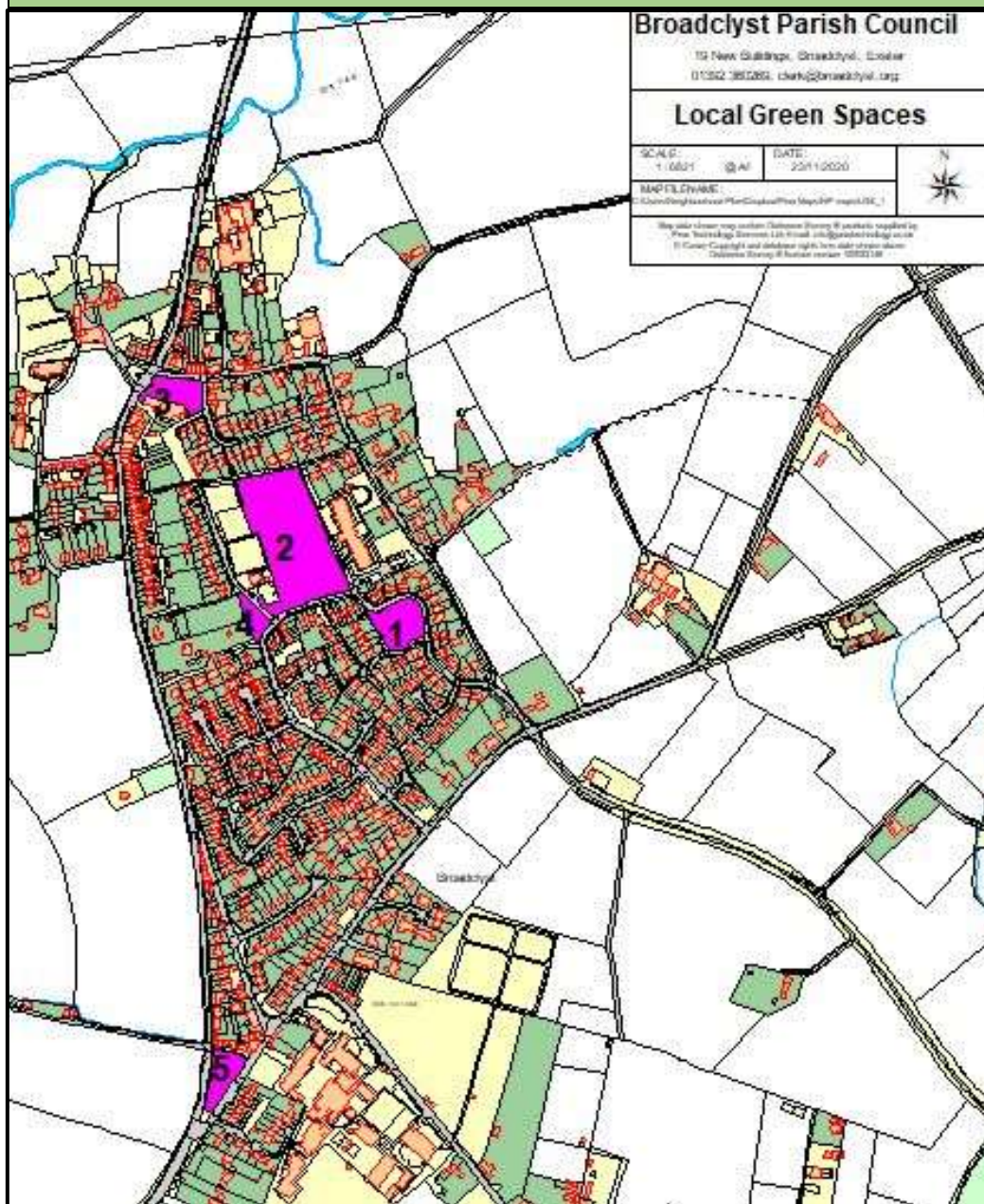
¹¹⁵ <https://www.woodlandtrust.org.uk/>

Policy NE6: Local Green Spaces

The following accessible community green spaces in Figure 62 have been demonstrated to be of significance to the local community. These sites, all in Broadclyst Village, have been designated as Local Green Spaces (in accordance with paragraphs 101 and 102 of the NPPF (2021) in Appendix 26):

1. Oak Tree Close.
2. Recreation Ground.
3. Village Green.
4. Holly Close Triangle.
5. Chapel Orchard, Dog Village.

Development proposals affecting the designated local green spaces will only be supported in very special circumstances.



Justification Policy NE6

1. Broadclyst Village benefits from a network of valued and well-used local green spaces, which play a significant role in contributing to the character of the local area and provide residents with a variety of leisure opportunities.

2. During the preparation of the Plan, there was a clear consensus amongst the local community that those most valued local green spaces should be protected. In the Community Survey green places of public value were asked to be submitted, giving reasons as to their value. The sites in the policy were selected from this data by the Natural Environment Steering Group and were presented in the Public Sites Consultation. There was recognition that these local green spaces are important to the rural character of Broadclyst Village, enhancing the setting of the village townscape and public realm. Results from the community consultation revealed an overwhelming support, with above 94% of the responders voting in favour of all the local green sites. (See Appendix 7).

3. The role of local green space is supported with experts increasingly agreeing that a connection to nature is vital to the happiness and wellbeing of the nation. Proximity to open green spaces in urban areas has been shown to reduce stress levels, and one study by Mind¹¹⁶ found that a walk in nature and natural surrounding led to 71% of participants feeling more positive, with 88% experiencing an overall boost in their mood.

4. Broadclyst Parish's countryside offers a wonderful experience of nature free to all, with stunning landscapes, tranquil spaces, and the opportunity to explore. Research consistently shows us that using or having a connection with nature is good for us in many different ways. The living world can focus and restore our attention. It can help give us the space to ease our pain and allow us to heal. Unlike concrete, nature can re-invigorate children's concentration and strength. With such an array of immeasurable benefits, these spaces need to be protected.

5. A great deal of land in the parish is under the ownership of the National Trust and is protected however, other green spaces in and around settlements and communities do not have such protection unless protected as a Local Green Space or as Green Belt Land.

6. The NPPF (2021) makes provision for neighbourhood plans to identify for special protection green areas of particular importance to local communities and sets out the following requirements a green area or open space needs to meet, in order to be considered suitable for Local Green Space designation, where:

- the green space is in reasonably close proximity to the community it serves;
- the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and
- the green area concerned is local in character and is not an extensive tract of land.

Each Local Green Space designation contained within Policy NE6 has been assessed against these criteria to meet the requirements of the NPPF (2021) paragraphs 101 and 102. Full details of this

¹¹⁶ <https://www.mind.org.uk/information-support/tips-for-everyday-living/nature-and-mental-health/how-nature-benefits-mental-health/>

assessment are contained in Appendix 26. Policy NE6 follows the matter-of-fact approach in the NPPF. If development proposals come forward on the local green spaces within the Plan period, they can be assessed on a case-by-case basis by the District Council. It will be able to make an informed judgement on the extent to which the proposal concerned demonstrates the ‘very special circumstances’ required by the policy. Appropriate proposals might include schemes which would enhance the accessibility, biodiversity, and community and/or educational value of these spaces.

7. It was noted that the only green spaces put forward in the Community Survey for protection under Local Green Space legislation were in Broadclyst Village. In the community events comments revealed that there was a desire for other green areas to be identified and put forward for protection in settlements and communities such as Broadclyst Station, Westclyst, Tithebarn and Blackhorse. This would ensure that green spaces are provided within the other settlements and communities of the Parish and not exclusive to Broadclyst Village. This policy has highlighted the dominance of local green spaces in only one settlement and the need for green spaces to be identified, utilised and recognised as valuable assets to those residents that live in the other communities in the parish. A Community Project to identify local green space and safeguard land across the parish will also ensure more parity of sites across the parish in the future.

Policy NE7: Flood Management

1. The Broadclyst Parish has three main water courses: The Culm which links into the River Exe; The Cranny which joins The Clyst; The Clyst itself which eventually runs into the Exe Estuary at Topsham.

2. Fluvial flood risk is highest in the western part of the NP area (Figure 63), including a high risk (probability > 1 in 100 of flooding within the area) of flooding, localised to broad corridors in the north and southwest. This broadly follows the south westerly direction of the River Clyst, which flows through the northern part of the Plan area towards Topsham, near Exeter. The River Culm, which traverses the north-westernmost side of the Plan area presents additional high-risk fluvial flooding.

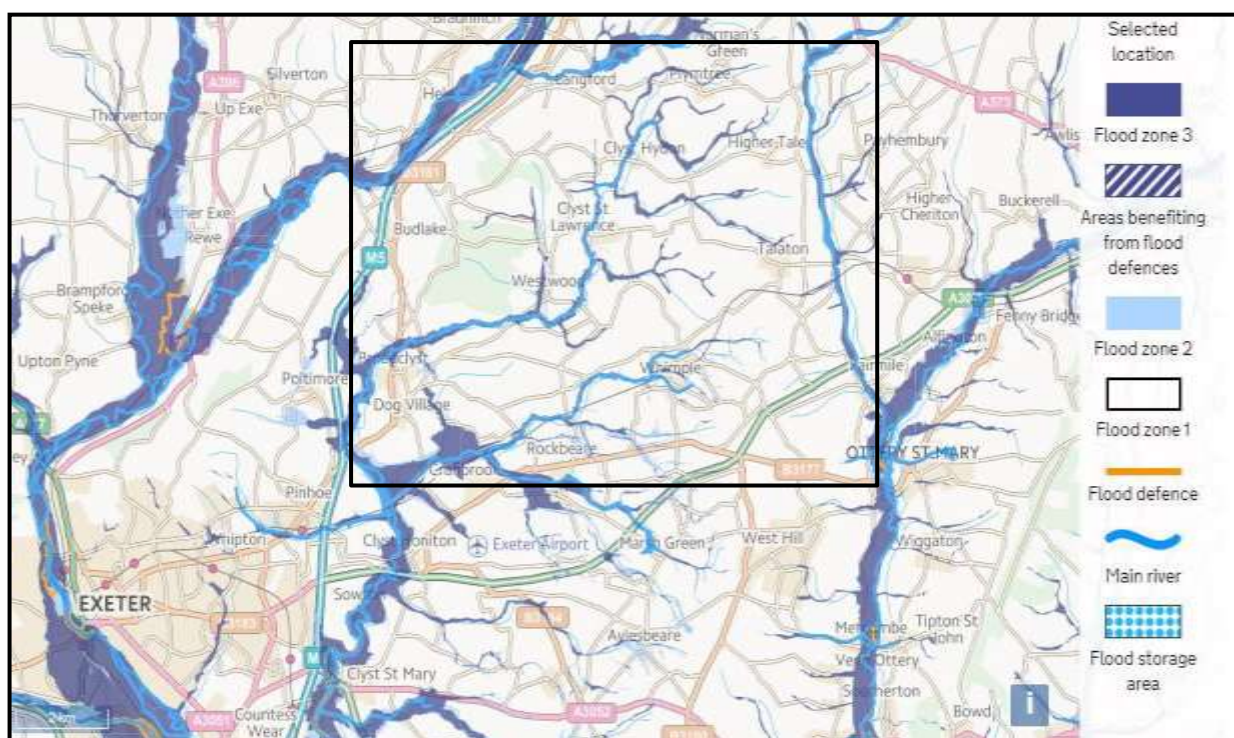


Figure 63: Broadclyst fluvial flood risk (approximate area inbox)

3. Flooding, mostly fluvial, in Broadclyst is extensive (Figure 63), distributed through narrow thin but localised ribbons following streams and tributaries within the NP area. However, areas of high risk are mostly concentrated on the eastern sides of the Plan area, following the flow of the River Clyst along the Clyst Valley.

Intent Policy NE7

Policy NE7 seeks to improve river and stream management to reduce the impact of flooding and water quality in Broadclyst Parish.

Policy NE7: Flood Management

New development proposals where appropriate will be expected to demonstrate how Natural Flood Management (NFM) measures will be incorporated to ensure the efficient management of flood risk. These will include:

- **Tree and hedgerow planting to slow the rate of water flow across a catchment.**
- **River and floodplain naturalisation (reconnecting rivers to their floodplains).**
- **Provision of woody debris dams.**
- **Schemes which enhance and improve soil/land management.**
- **Creation of water storage capacity within the floodplain.**
- **Biodiversity enhancements that will help to deliver NFM measures.**

Proposals for engineered flood defence schemes along the Rivers Culm, Cranny and Clyst that will significantly improve natural flood and water management will be supported where they:

- **Provide natural biodiversity enhancement, riverbank and aquatic habitat creation and water quality improvement.**
- **Minimise impacts listed in Policy D1.**

Flood defence schemes that also provide renewable energy through micro-hydro schemes will be supported where located appropriately to minimize 'bad neighbour' impacts as specified in Policy D1.

Justification Policy NE7

1. With such extensive waterways the policy supports natural flood management measures that lower the risk of flooding, increase the land's natural water holding capacity and help to slow the rate of flow through the river and drainage network. This mitigation using natural processes to reduce the risk of flooding is the first-choice option for flood alleviation schemes within the Parish. This is supported in Paragraph 120b (NPPF 2021),

"Planning policies and decisions should: recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;"

2. New development could have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk. New development needs to recognise the need to steer development to areas of lowest flood risk, which is in line with the NPPF 2021 and the EDLP (2013-2031). This policy requires new development to provide (NFM) measures first in the process of mitigation in areas that surround flood risk areas. An

appropriate clause has been added so that these measures are implemented in relation to the size and scale of development.

3. Climatic changes can affect local flood risk in several ways. Wetter winters and more rain falling in wet spells may increase river flooding. More intense rainfall causes more surface runoff, increasing localised flooding and erosion. In turn this may increase pressure on drains, sewers, and water quality. Rising river levels may increase local flood risk inland or away from major rivers because of interactions with drains, sewers and smaller watercourses. Policy NE7 is to highlight the need for flood risk mitigation to be an integral part of development planning, to increase resilience of the natural environment to the effects of climate change, and to ensure that the potential flooding risks associated with climate change are considered in new development in the parish.

4. The Water Framework Directive (WFD) drives a catchment-based approach to water management with a view to improving the overall water quality of watercourses in any given catchment. Broadclyst is located within the South West River Basin District, specifically, the Devon East Management Catchment, and falls within the Operational Catchments: The Clyst and Culm Operational Catchment. The Clyst and Culm Operational Catchment contains 19 water bodies. With regards to water quality within the Plan area, 11 of the 19 water bodies within the Clyst and Culm Operational Catchment have 'poor' or 'bad' ecological status or potential. The most common reasons for not achieving at least 'good' potential include agricultural and rural land management, the water industry, industry and the general public. This policy promotes best agricultural practice and measures to mitigate the risk of pollution to the watercourses, as well as defense schemes which support improvements to water quality. In Devon the introduction of beavers as a natural flood defense scheme is in its early days, but this could be seen as a more natural flood management scheme.

5. Flood risk management works best when a 'catchment-based approach' is taken, where a plan is developed to manage the flow of water along the whole length of a river catchment from its source to sea. This way, natural processes can be used upstream and engineered flood defences, such as walls and weirs, can be placed in areas of extensive run often in the populated areas. This policy is only supportive of engineered flood defences at appropriate places in the parish, and those which work in partnership with NFM for improved water management.

6. This policy not only reduces flood risk it can also achieve multiple benefits for people and wildlife, by helping to restore habitats of both bank and aquatic life including invertebrates, improving water quality, and helping to make catchments more resilient to the impacts of climate change. This policy also recognises that water flow can be utilised for the production of renewable energy which is supported by the community.

7. This policy is about active prevention and that is why there is support for schemes which enhance and improve soil/ land management in support of flood management. It is important to include a reference to the use of effective surface water management schemes to embrace the principle of sustainable drainage systems (SuDS) which are included in DC3.

7. Review and Revision of Broadclyst Neighbourhood Plan

Implementation, Monitoring and Reviewing the Plan

After Referendum, the Broadclyst Neighbourhood Plan must be delivered, implemented and monitored over the Plan period (2022-2031). Broadclyst Parish Council's involvement in the Neighbourhood Plan process will now transition from a plan making focus to Plan implementation and delivery of community projects.



Figure 64: The process after a NP is made.

Who is responsible?

The lead organisations for the Plan are Broadclyst Parish Council (BPC) and East Devon District Council (EDDC),

There are two elements of the Plan which must be implemented and monitored:

- The implementation and monitoring of the **policies** in the Plan.

The Plan when 'made' (i.e. brought into force or adopted by EDDC) will form part of the statutory development plan for the Plan area in question. Consequently, decisions by the District Council in its capacity as Planning Authority on whether to grant planning permission, will need to be made in accordance with the neighbourhood plan, unless material considerations indicate otherwise.

- The implementation and monitoring of **community actions** in the Plan.

Community Actions are not part of the 'development plan' as planning policies, but feature in the Neighbourhood Plan as they address important local issues. Regular review will ensure that these actions are being addressed by those responsible.

There is recognition that the implementation of the Neighbourhood Plan creates new opportunities for the Parish Council, and this will be reflected in its working practices.

Policies of the Plan

1. The Plan contains 37 policies in areas of: Community Facilities, Design, Economy and Employment, Housing, Infrastructure and Access, and Natural Environment.
2. Broadclyst PC, as a statutory consultee for all planning applications within the Plan area, providing a substantive response to every planning application and ensuring that all planning applications adhere to the policies in the Plan.

Role of East Devon District Council

The final decisions on planning applications rest with EDDC, as the local planning authority. Planning permissions will be granted in accordance with all relevant planning policies, including those in the BNP. The Plan has the same legal status as other EDDC statutory Documents:

"A neighbourhood plan attains the same legal status as the Local Plan once it has been approved at a referendum. At this point it comes into force as part of the statutory development plan. Applications

for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise”. (see section 38(6) of the Planning and Compulsory Purchase Act 2004)

It is of note that section 38(5) of the Planning and Compulsory Purchase Act 2004 shows that the Plan has the status of being the most recent Plan to be made:

“If to any extent a policy contained in a development plan for an area conflict with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan”. (38(5) of the Planning and Compulsory Purchase Act 2004)

Monitoring the Broadclyst Neighbourhood Plan

Policies

To make sure that its plan continues to be effective, Broadclyst PC will, however, need to adopt local level monitoring. An example of a policy monitoring template is provided in Appendix 1A.

The PC’s monitoring framework will also aim to address questions such as:

- **Are planning applications being determined in accordance with neighbourhood plan policies?**
- **If not, are clear and valid reasons being given in officer reports?**
- **Are policies proving to be effective in shaping local authority and appeal decisions?**
- **If policies are not proving to be effective, then why?**
- **Are any significant issues arising that are not covered by neighbourhood plan policies?**
- **Have policies had unintended consequences that were not originally anticipated?**
- **How many policies are being used?**
- **Which policies are ineffective?**
- **Are there any policies missing?**
- **Do policies need rewriting?**

The PC’s monitoring framework should focus on whether or not proposals are approved and also look at conditions where planning permission is granted. Conditions may be a direct response to Neighbourhood Plan policies. However, there might be instances where a departure from neighbourhood planning policy has been allowed. The monitor of planning officer reports and decisions against NP policies is an important part of the monitoring process.

Ongoing monitoring will give clear indication of the effectiveness of the Plan. In practice, the reasons why neighbourhood plan policies might be ineffective include:

- Policies are vague or comprise general aspirations, rather than providing a clear test against which development proposals must be considered;
- Issues are identified in the plan, but are not then addressed in the policies;
- Policies are being interpreted differently than intended.

Where policies are ineffective, an early review can be undertaken to inform actions that need to be taken to address the issue, such as the need to redraft the policies of the Plan.

A responsibility for monitoring neighbourhood plans also rests with the District Council and this function will be carried out by EDDC.

Community Actions: Aspirations and Projects.

The community actions are not part of the statutory neighbourhood plan but are just as important in delivering the community's aspirations and, as the qualifying body, Broadclyst PC will play a key role in ensuring the delivery of these actions.

Implementation and who is responsible?

Partnership working will be a key element in the successful implementation of the community actions. It will be essential to ensure good working relationships with many outside organisations to ensure the completion of the actions, amongst which will be:

- EDDC - Planning Policy, Development Management, Housing, Economic Development, Open Spaces, Recreation and Community Facilities
- Devon County Council – Highways, Education & Social Services
- Statutory Agencies: Environment Agency, Historic England, Natural England
- Smaller organizations, such as the Broadclyst community associations and others including charities.

Some of the community actions will involve pressuring others to act, rather than direct delivery. The diversity of the actions necessitates a flexible approach to avoid duplication and ensure best use of the available resources.

Community Infrastructure Levy (CIL) for the Parish

CIL is a planning charge, introduced by the Planning Act 2008,¹¹⁷ which can be levied by planning authorities on new development in their area.

MHCLG (2014) CIL¹¹⁸ guidance confirms that where a Neighbourhood Plan has been approved, 25% of the CIL on dwellings within that area will be available to the relevant Parish or Town Council.

Infrastructure Projects

There were a total of 19 community actions and projects identified in the neighbourhood planning process, seven of these projects were identified as infrastructure projects and labelled as CIL specific policy projects which could be funded, or part funded by utilising the PC's meaningful proportion of CIL.

There are another 12 projects/ actions evidenced that comply with the wider criteria set out in the CIL Neighbourhood Planning Toolkit 2017.¹¹⁹ The PC will rank these 12 actions/ projects, utilising knowledge of the community priorities, and decide on funding streams for each project. The CIL funding will be reconsidered at this stage as it might be that these projects and actions can be supported by CIL funding.

In addition to monitoring whether community actions have been achieved, the impact and outcomes of those actions should be assessed on a regular basis, ideally there will be an annual monitoring

¹¹⁷Planning Act (2008) Part II Community Infrastructure Levy

<http://www.legislation.gov.uk/ukpga/2008/29/contents>

¹¹⁸ MHCLG (2014) CIL Guidance Paragraph: 145 Reference ID: 25-145-20190901 Revision date: 01/ 09/19
<https://www.gov.uk/guidance/community-infrastructure-levy#charging-schedules-and-rates>

¹¹⁹ <https://neighbourhoodplanning.org/toolkits-and-guidance/understanding-community-infrastructure-levy-cil/>

report to the PC. Timing of the reporting might be linked to the new financial year, or to grant funding timelines. Monitoring should include an assessment of the economic, community and environmental impacts.

For grant-funded projects, outputs and outcomes usually have to be monitored and reported on, as a requirement of the funding.

Monitoring frameworks can be utilised to show the following:

- **How many of the infrastructure projects have been delivered?**
- **How many of the projects are still relevant and applicable?**
- **Time phasing of projects.**
- **The phase that the project is in.**
- **Project outcomes.**
- **Key actions.**
- **Delivery agencies.**
- **Funding/ Budgets.**

The framework provided in Appendix 1B makes it easy for the community actions to be reviewed on an annual basis and also allow projects to be identified and tracked.

Monitoring the Broadclyst Plan

Broader Objectives

1. Monitoring should also consider whether the broader objectives of the Plan are being achieved. Monitoring of planning decisions, projects and actions are all part of this, but consideration of their collective outcomes is important, and this is likely to require a more strategic and area-wide perspective.

As a purpose of neighbourhood plans is to achieve sustainable development, appropriate measures of success are whether the plan is delivering or has delivered growth and whether that growth has been sustainable, considering social, economic and environmental impacts and outcomes.

Changes to Policy and Guidance

In addition to monitoring the impact of the Plan, it will be necessary to monitor changes to external policies and their effect on the Plan.

National policy is a 'material consideration' in planning decisions and might be used to justify a departure from the policies of a neighbourhood plan.

The impact of changes to local policy would also need to be considered. The potential adoption of a new Strategic Plan will require a revised or a new East Devon Local Plan which might result in policies differing from the Neighbourhood Plan.

In all cases the policies in the most recent plan carry the most weight with planning applications. The conclusion is that changes to national and local policy will result in a need to consider a revision of the BNP, in order to address any consequent incompatibilities.

Changes to other types of legislation, such as extensions to permitted development rights, might undermine Neighbourhood plan policies and should consequently be monitored.

Review and Revision of Broadclyst Neighbourhood Plan

Reviewing the Broadclyst Neighbourhood Plan to assess any need for revision should be done as part of the monitoring process.

One or more of organisation such as the District Council, statutory undertakers, strategic bodies, and local stakeholders could highlight the need for revision. The decision to revise the Plan and subsequent actions to achieve this can however only be undertaken by Broadclyst PC as the qualifying body.

Updating Broadclyst Neighbourhood Plan

There is no statutory timeframe within which neighbourhood plans are required to be reviewed or updated, but this could be affected by the findings of the annual monitoring reports. Over time, the Plan, its policies, and community actions may become out of date.

The Parish Council will monitor changes in circumstances affecting the Plan in a very careful fashion. A key matter will be progress on the emerging Local Plan for East Devon. This plan will cover the period up to 2040. The Parish Council will consider the need or otherwise for any review or update of the neighbourhood plan once the emerging Local Plan has been adopted.

The Ministry of Housing, Communities and Local Government provides guidance on updating a Neighbourhood Plan¹ which covers the following:

- **In what ways can a neighbourhood plan or order be changed?**
- **When will it be necessary to review and update a neighbourhood plan?**
- **How are minor neighbourhood plan or order updates made?**
- **How are more substantive neighbourhood plan updates made?**
- **Do neighbourhood plan updates require a referendum?**
- **How is the decision on whether modifications change the nature of the plan made?**
- **Does a neighbourhood plan have to be updated every two years?**

Conclusion

Neighbourhood plans are a tool to give communities more control over the type, location, size, pace, and design of development in their area, introduced under the Localism Act 2011 as part of a suite of new community rights. Implementing, monitoring, and revising the Plan will create new opportunities for Broadclyst Parish Council and these must be fully utilised for the benefit of the community.

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Broadclyst Football club
Tornados Netball Club
Broadclyst and Killerton Tennis Club
Broadclyst Cricket club
Broadclyst Bowling Club
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Appendices

Appendix 1. Templates for Implementation, Monitoring and Reviewing the Broadclyst Neighbourhood Plan *

Appendix 2. DCT: Community Survey (2016)

Appendix 3. Nupremis: Basic Conditions Statement (2021)

Appendix 4. Draft Sustainability Appraisal (2021) *

Appendix 5. AECOM: Strategic Environmental Assessment SEA (2021)

Appendix 6. AECOM: Habitats Regulation Assessment (HRA) (2021)

Appendix 7. Consultation Statement (2021) *

Appendix 8. DCT: Housing Needs Survey (2017)

Appendix 9. Design and Climate Change Evidence Combined Document*

Appendix 10. Housing Evidence Combined Document*

Appendix 11. Infrastructure and Access Evidence Combined Document*

Appendix 12. Natural Environment Evidence Combined Document*

Appendix 13. National Trust: Vision and Concept: Killerton destination estate. (2019)

Appendix 14. Parish Design Code Document (2021) *

Appendix 15. Broadsheet: Article on the Community Sports Hub (2019)

Appendix 16. EDDC: Heritage Impact Assessment (2018)

Appendix 17. EDDC: Feasibility assessment of multi-use sports pitch (2020)

Appendix 18. AECOM: Site Options Assessment (2019)

Appendix 19. Sites Allocation Process (2021) *

Appendix 20. National Trust: Guide to Heritage in Neighbourhood Planning (2019)

Appendix 21. Stratton and Creber: Commercial Report of Sites (2018)

Appendix 22. Natural England: National Character Assessment 148

Appendix 23. Devon Wildlife: Biodiversity Report (2015)

Appendix 24. EDDC TPO map

Appendix 25. NP Sites CVRP Objectives Table*

Appendix 26. Local Green Space Designation Document (2018) *

Appendix 27. EDDC: Viability Note (2020)

Appendix 28. EDDC: Sports Pitch Strategy (2015)

Appendix 29. AECOM: Evidence Based Policy Development (EBPD) Report (2021)

Appendix 30. AECOM: Health Check Report (2021)

Appendix 31. Sports England: Car Park and Landscape Design.

Appendix 32. Heathfield Farm Document (2019) *

Appendix 33. EDDC: Clyst Valley Park Masterplan (2021)

Appendix 34. Devon Home Choice: Statement (2021) *

Appendix 35. EDDC: Draft Legal Compliance Assessment (2022)

Appendix 36. AECOM: Viability Assessment (2022)

* Donates those produced and/ or combined by the Parish Council

Glossary

The following terms are used in the Broadclyst Neighbourhood Plan:

SUBJECT/ TERM	DEFINITION
Adopted East Devon Local Plan: Local Plan / EDLP	The plan for the future development of the local are for the period 2013-2031, drawn up by the District Council (EDDC) in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan.
Biodiversity	The variety of life in all forms e.g. wildlife, plants, etc.
Built Up Area Boundary BUAB	Built-up area boundaries are used to identify the areas within which development may be appropriate, including infilling, redevelopment and conversion of buildings but they do not necessarily cover all existing developed areas. Simplistically planning applications within the BUAB are deemed allowable and have to justifiably be refused.
Community Actions/ Projects	These are generally non-land use policies and represent aspirations developed for the benefit of the community. They require community action from members of the local community including community groups, landowners, charitable and public bodies.
Conservation Area (CA)	An area of special architectural or historic interest, designated. by the District Council under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. There are additional controls over some development, demolition, minor developments and the felling of trees in conservation areas.

SUBJECT/ TERM	DEFINITION
Conservation Area Appraisal	EDDC produced a Conservation Area Appraisal in November 2007. The Council may designate areas of special architectural or historic interest as Conservation Areas. The aim of this to enhance or preserve the character of such an area.
Design and Access Statement	A design and access statement (DAS) is a short report accompanying and supporting a planning application. It provides a framework for applicants to explain how a proposed development is a suitable response to the site and its setting and demonstrate that it can be adequately accessed by prospective users.
Design Code	A Design Code (Dc) is a practical tool to help influence decisions on design of development. Prepared correctly, it will provide a clear statement of the character of a particular village or town against which planning applications may be assessed.
Flood Risk Assessment	An assessment of the likelihood of flooding in a particular area so that development needs, and mitigation measures can be carefully considered.
Live -Work Unit	The provision of a room with an external door (on either floor) that is designated as an office/workspace for those living in the house and is to be in addition to the specified number of bedrooms and bathrooms, any other living rooms including a utility room and, in addition to a garage if included.
Local Education Authority	The public body whose duty it is to carry out specific functions relating to education for a particular area. All references to local education authority apply in this Plan to Devon County Council.
Local Green Space	Green areas of particular importance to local communities designated to provide special protection against development.
Local Plan	A portfolio or folder of documents (Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs), setting out the planning strategy for a local planning authority area.
Local planning authority	The public body whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority apply in this Plan to East Devon District Council.
National Planning Policy Framework NPPF (2021)	The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable

SUBJECT/ TERM	DEFINITION
	councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of communities.
National Planning Practice Guidance NPPG	The National Planning Practice Guidance is a web-based resource which brings together planning guidance on various topics into one place. It was launched in March 2014 and coincided with the cancelling of the majority of Government Circulars which had previously given guidance on many aspects of planning.
Neighbourhood Plan	A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).
Playing Pitch Strategy (PPS)	An evidence-based document that Sport England recommends councils produce to guide investment, development and improvements in pitch sport facilities and meet the requirements of the National Planning Policy Framework.
Strategic Housing Market Assessment SHMA	A Strategic housing market assessment is a study of the way the housing market works in any particular area. It looks into the type of households living in the area, where they work and what sort of housing they live in. It attempts to estimate future housing needs across the area, broken down by tenure and size of housing.
SEA (Strategic Environmental Assessment)	A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.
SUDS	Sustainable drainage is a concept that makes environmental quality and people a priority in drainage design, construction and maintenance. The sustainable drainage system (SUDS) approach includes measures to prevent pollution, reduce surface water runoff at source and provide a range of physical structures designed to receive the runoff.
Supplementary Planning Document (SPD)	Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.
Sustainability Appraisal	The consideration of policies and proposals to assess their impact on sustainable development objectives.

SUBJECT/ TERM	DEFINITION
Sustainable Tourism	A development proposal which contributes to the conservation and enhancement of the natural environment whilst providing for the needs of users and bringing benefits to the local economy and avoid unacceptable impacts on the local environment.
TPO	Tree Preservation Order

Abbreviations

BPC	Broadclyst Parish Council
BCS	Basic Condition Statement
BUAB	Built Up Area Boundary
CABE	Commission for Architecture and the Built Environment
CIL	Community Infrastructure Levy
CVRP	Clyst Valley Regional Park
DAS	Design and Access Statement
DCC	Devon County Council
Defra	Department of the Environment, Food and Rural Affairs
DfT	Department for Transport
EBPD	Evidence Base and Policy Development
EDDC	East Devon District Council
EDLP	East Devon Local Plan (adopted) (2013-2031)
HRA	Habitat Regulation Assessment
HNS	Housing Needs Survey
MHCLG	Ministry of Housing, Communities and Local Government
NEDLP	New East Devon Local Plan (emerging)
NPPF	National Planning Policy Framework
NT	National Trust
NPPG	National Planning Practice Guidance
SEA	Strategic Environmental Assessment
SSSI	Site of Special Scientific Interest
TPO	Tree Preservation Order
WMS	Written Ministerial Statement
