

East Devon Local Plan Examination – comments on further submissions

Response by Savills on behalf of Hallam Land Management

Respondent reference: 6207

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1. Introduction

These representations are submitted by Savills on behalf of Hallam Land Management (HLM) and the Pinhay Estate in response to consultation on further evidence and proposed changes to the East Devon Local Plan.

The further evidence base documents produced by EDDC have been considered, with particular focus on housing requirements and five year land supply, and our comments are set out below.

Although the further evidence is a step forward, the proposed changes to the plan do not address the key issues of soundness raised at the Examination hearings and serious shortcomings remain in relation to housing provision, settlement strategy, and five year housing land supply.

Housing provision does not address historic undersupply, and that there will not be a five year supply of housing land available on adoption of the plan. Furthermore, the proposed changes to the plan do not address the concerns relating to the spatial strategy that were expressed at the Examination; the strategy continues to rely heavily on major development sites in East Devon's West End, with very limited growth provided for at the small towns and large villages.

2. Housing requirements update

Background

The Examination hearing sessions highlighted several failings in relation to the proposed housing requirement, in particular that the plan is under providing due to the following reasons:

- lack of testing against the latest DCLG 2012 based population projections;
- failure to adjust housing provision to take account of the significant shortfall in housing provision over the period between 2006-2013;
- the need to consider a full range evidence (including market signals, employment projections and migration factors) as a basis for the objective assessment of housing needs, recognising the limitations of recent household forecasts that are based on a period of recession.

Edge Analytics and Understanding Data Reports

The Edge Analytics August 2015 update report (PSD2015t) provides a useful update of projected household growth using a jobs-led (policy-on) scenario based on the latest DCLG 2012-based household projections. The report provides sensitivity testing using DCLG 2008-based and 2011-based headship rates, and a range of assumptions for economic activity and commuting.

The report identifies an average annual dwelling requirement of 943 for the CLG12 scenario using the Edge Analytics 'Core' assumptions, with the CLG08 and CGL11 scenarios indicating an annual need of 981 and 919 dwellings respectively.

The 'Core' economic assumptions on which this is based include a reduction in unemployment from 4.8% to 2.8% by 2020, a commuting ratio of 1.11 based on the 2011 census, and an adjustment to economic activity rates to reflect changes to the state pension age. Sensitivity testing shows that the requirement could rise to between 1,020 and 1,084 dwellings per annum if commuting increases by 5% and economic activity rates remain at their current levels.

The use of the CLG12 'Core' scenario is supported by the *Demographic advice for East Devon Council* report of August 2015 by Understanding Data (PSD2015u), partly on the basis that no convincing case was made at the examination for significant changes to be made to the core assumptions.

We are broadly in agreement with the findings of the Edge Analytics August 2015 report jobs-led CLG12 'Core' scenario average annual dwelling requirement of 943 as a starting point for identifying housing provision for East Devon for the period 2013-2033. However, this assessment does not include any adjustment for the historic substantial under provision of housing, and does not take account of wider market signals such as house prices and affordability. Furthermore, it is unclear what allowance has been made, if any, for vacancy rates and second homes; this is a significant issue for East Devon with 2011 census data indicating a vacancy rate of 7.6%.

Accounting for previous under supply

Housing provision in East Devon for the period 2006 to 2013 fell well short of meeting the housing targets set out in the adopted Local Plan and the draft RSS. This historic shortfall in housing provision is not addressed in the revised Local Plan housing provision of 18,318 homes in the period 2013 to 2031 (1,017 dwellings per annum).

In order to quantify the historic shortfall in housing provision over the period 2006-2013, Table 1 provides a comparison of net housing completions in South Devon between 2006 and 2013 against the following housing provision targets:

- 584 dwellings per annum retrospective target identified in the SHMA

- 774 dwellings per annum based on the annual housing requirement from the adopted Local Plan for the period 2006-2011, rolled forward to 2013.
- 855 dwellings per annum based the annual housing requirement from the draft revised Regional Spatial Strategy incorporating the Secretary of State's Proposed Modifications (2008).
- 950 dwellings per annum based on the Revised Local Plan target.

Table 1: East Devon Net Completions / Requirements 2006-2013

	06/07	07/08	08/09	09/10	10/11	11/12	12/13	Overall Surplus / deficit
Net completions	374	284	224	393	565	320	467	
Surplus / deficit based on retrospective SHMA target of 584 dpa	-210	-300	-360	-191	-19	-264	-117	-1461
Surplus / deficit based on Adopted Local Plan target 743 dpa	-369	-459	-519	-350	-178	-423	-276	-2574
Surplus / Deficit based on the draft SW RSS (2008) target of 855 dpa	-481	-571	-631	-462	-290	-535	-388	-3358
Surplus / deficit based on revised Local Plan target of 950 dpa (applied retrospectively).	-576	-666	-726	-557	-385	-630	-483	-4023

The unmet need for housing arising from the shortfall in housing provision between 2006 and 2013 of between 1,461 and 4,023 dwellings is not addressed in the Edge Analytics or the Understanding Data reports, and is effectively 'written-off'. This is contrary to Planning Practice Guidance, which advises that '*If the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan.*'

The failure to address the historic under provision means that the new Plan will simply carry forward the existing housing affordability issues that face the District, which already has one of the highest house price to income ratios in the region.

In order for the new Plan to address the historic shortfall in housing provision that took place between 2006 and 2013, and to tackle the associated affordability issues, the overall housing provision for the period 2013-2031 should be increased by between 2,493 and 4,149 new homes to take account of the historic under provision.

Accounting for market signals

As noted in our previous statements, the DCLG household projections provide a roll forward of past demographic trends. They are identified by Planning Practice Guidance as the starting point for objectively assessing housing need at a local level. However, they do not tell the whole story and can be misleading.

For a start, they are projections of recent trends, not forecasts. Hence, since the economic downturn, the forecasts indicate a reduced level of household formation, which is a reflection of affordability pressures restricting access to the housing market and lower levels of house building.

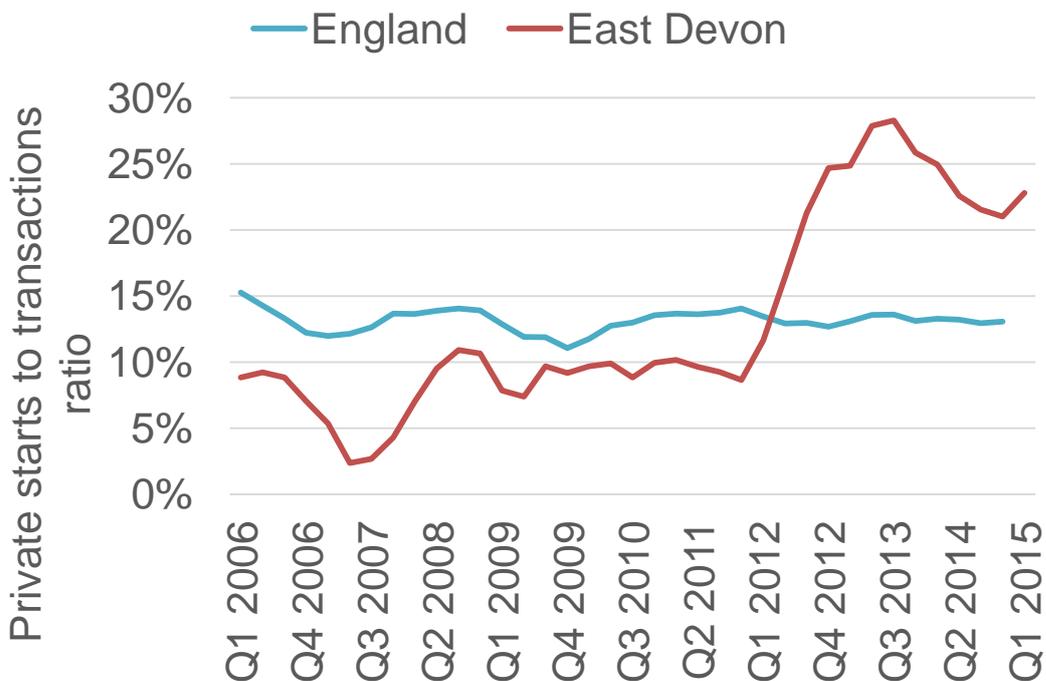
Issues at a national level are magnified at a local level. Households can only form if there is a home for them to move into. If not enough homes are built, the household projection will be correspondingly lower. Forecasts in areas with historically low levels of house building may therefore mask high levels of concealed housing need.

Household projections are heavily based on population projections and as such are dependent on assumptions of certain unknowns such as future trends in migration. Any change in the attractiveness of an area as a place to live, work or study could have a significant impact on the population projections, which feeds through into the household projections.

Analysis by the Town and Country Planning Association (TCPA) in 2013 (undertaken by the late Alan Holmans) takes into account economic factors such as the 2008/09 downturn and indicates that the true need for housing in England is 240-245,000 homes per year, far in excess of the 210,000 stated in the latest official household projections issued in 2012.

It is therefore essential to investigate the full range of evidence available, including market signals, to understand all the interlocking factors that contribute to the need for housing now and in the future.

The following chart shows the ratio of private housing starts to transactions in East Devon Compared to England. This demonstrates that prior to 2012, there were 6 years where the ratio of starts to transactions in East Devon was significantly lower, suggesting that there was undersupply and that the market could have absorbed more homes.



The shortfall of in housing completions in East Devon in the period 2006 to 2013 remains a significant issue that has not been adequately addressed in the further evidence or the August 2013 proposed changes to East Devon Local Plan.

As set out in our previous statements, HLM commissioned DLP planning to provide an assessment of the objectively assessed housing needs for East Devon District Council for the period 2011-2031. In summary, the DLP report identifies an objectively assessed housing need of 980 dwellings per annum, which is in broadly in line with the Edge Analytics Jobs-led (Policy-on) CLG08 scenario. However, DLP consider that wider migration and affordability factors should be taken into account in establishing the housing requirement for East Devon, which indicate a housing requirement in the range 1,100 to 1,300 dwellings per annum.

3. Housing trajectory

The EDDC Housing Delivery Paper of August 2015 (ref PSD2015s) provides an updated housing trajectory, supported by revised housing delivery rate projections for large sites (ref PSD2015s appendix 1) and affordable housing (ref PSD2015s appendix 2), and a Housing Monitoring Update report to 31 March 2015 (PSD2015s Appendix 3).

The Housing Monitoring Update provides the Council's latest five year housing land supply calculations. These calculations are based on the Sedgefield approach and a 20% buffer. This is considered the most appropriate approach and the general methodology used in the calculations is supported.

However, there remain a number of serious concerns, in particular: errors in the 5 year land supply table; a failure to address the historic undersupply of housing, and; assumptions regarding delivery rates for certain sites. These concerns are set out below.

Factual errors in EDDC's Five Year Land Supply Calculations

The five year land supply calculation set out at page 44 of the Housing Monitoring Update to 31 March 2015 (PSD2015s Appendix 3) include a number of factual errors that appear to be a result of a failure to update the completions / forecasting periods in the 'Item' column of the table to reflect the updated figures in the table.

These errors are summarised as follows:

- Row D: requirement to have been delivered shows 30 Sept 2014 instead of 31 March 2015
- Row E: end date for the completions range shows 30 Sept 2014 instead of 31 March 2015
- First row of supply section should state

As a consequence, the table includes an element of double counting and does not provide the sound evidence base required to demonstrate a five year land supply.

Further errors in the housing land supply calculation arise as a result of the failure of planned housing provision to account for historic under delivery in the period up to 2013, and unrealistic delivery rates for extant consents, strategic allocations and windfalls.

Housing requirement

As noted in our comments on the housing requirements update reports, and in previous representations, the proposed housing requirement of 17,100 for the period 2013 to 2031 fails to take account of the under delivery of housing against planned targets. This is a significant shortfall amounting to between 1,461 and 4,023 dwellings (as shown in Table 1) which needs to be made up within the first five years of the new plan.

The impact of the deficit on the five year land supply is shown in Table 2, using the LPA's own delivery rates and method of calculation. This shows the five year land supply taking into account the deficit is in the range **2.75** to **4.48** years.

Table 2: 5 year land supply taking into account deficit in housing provision 2006-2013

	Item	Calculation	Deficit based on SHMA	Deficit based on Adopted LP	Deficit based on SW RSS	Deficit based on Revised Draft LP
A	Requirement		17100	17100	17100	17100
A1	Deficit		1461	2574	3358	4023
B	Annual requirement (before deficit is taken into account)	A/18	950	950	950	950
C	5 year requirement (including difecit)	Bx5+A1	6211	7324	8108	8773
D	Requirement to have been delivered by 31 March 2015 (before deficit is taken into account)	Bx1.5	1900	1900	1900	1900
E	Completions 1 April 2013 - 31 March 2015		1913	1913	1913	1913
F	Shortfall/surplus	D-E	-13	-13	-13	-13
G	5 year requirement (exluding buffer)	C+F	6198	7311	8095	8760
H	5 year Target (including 5% buffer)	Gx1.05	6508	7677	8500	9198
I	5 year Target including 20% buffer	Gx1.20	7438	8773	9714	10512
J	Annual Target (including 20% buffer)	I/5	1488	1755	1943	2102
	Supply element at 30 Sept 2014 expected to deliver 1 April 2015 - 31 March 2020					
K	Extant permissions (including under construction)		4897	4897	4897	4897
L	Site with resolution to grant permission		883	883	883	883
M	Strategic allocations		528	528	528	528
N	Future windfalls		350	350	350	350
O	Total deliverable supply	K+L+M+N	6658	6658	6658	6658
P	Total deliverable supply (excluding allocaitons without permission or windfalls)	K+L	5780	5780	5780	5780
Q	Total deliverable supply (excluding allocaitons but including windfalls)	K+L+N	6130	6130	6130	6130
R	Surplus/Defecit	I-O	780	2115	3056	3854
S	Surplus/Defecit (excluding allocations without permission or windfalls)	i-P	1658	2993	3934	4732
T	Surplus/Defecit (excluding allocations without permission but including windfalls)	I-Q	1308	2643	3584	4382
U	Years of land supply	O/J	4.48	3.79	3.43	3.17
V	Years of land supply (excluding allocations without permission or windfalls)	P/J	3.89	3.29	2.98	2.75
W	Years of land supply (excluding allocations without permission but including windfalls)	Q/J	4.12	3.49	3.16	2.92

Housing supply- large sites

The projected completions for the supply element of the five year land supply calculations are set out in section 3 of the Housing Monitoring Update to 31 March 2015.

The projected build out rates generally follow the approach advocated by the Exeter Housing Market Area (HMA) Strategic Housing Land Availability Assessment (SHLAA) methodology market conditions model, unless the Council are aware of an alternative build out rates. We consider this to be a reasonable approach that reflects current conditions.

Our previous representations raised serious concerns regarding a number of sites which do not yet have full consent (including s106 and reserved matters approvals), where housing land supply projections in the Housing Monitoring Update to September 2014 were clearly unrealistic.

The time period between resolution to grant outline consent, signing of the s106 agreement, land sale, and subsequent reserved matters consent can be substantial. A reasonable, cautiously optimistic approach would be to allow for a period of 18 months between grant of outline consent grant and grant of reserved matters consent, as often this period will involve the sale of the site to a house builder. A further 12 months between the grant of a reserved matters consent and start on site is reasonable to allow for the discharge of pre-commencement conditions and mobilisation of resources.

We note that some adjustments have been made in the Housing Monitoring Update to March 2015 to provide a more realistic projection, these adjustments are supported. However, there remain a number of sites where unrealistic assumptions have been made and further adjustments are required to provide an accurate projection. These are summarised in the table below.

Table 3: Review of delivery projections for extant permissions and strategic allocations on large development sites in Rest of East Devon

Site	Permission	EDDC commentary August 2015	Current position	Effect	Effect on 5 year HLSS
Land Adjacent To Buckingham Close (Plumb Park)	13/0297/MOUT	Pre-app meeting regarding reserved matters held September 2014. Email from landowners (Clinton Devon Estates) explains reserved matters planning application for 264 of the 350 homes due to be submitted Summer 2015 and first homes to be completed in 2016	No Reserved Matters application appears to have yet been submitted	1 year delay, first completions in 2017/18 rather than 2016/17. This would be consistent with approach calculated by EDDC on other sites where there is outline permission but no RM application (e.g. Land West of Hayne Lane, Land off Clapper Lane, Heathfield House on page 17 of report)	- 25
Land South Of King Alfred Way Newton Poppleford, Sidmouth	13/0316/MOUT	Reserved matters (15/0642/MRES) currently pending consideration and recommended for approval at August Committee. Assume completion from 2017/18 onwards in line with SHLAA methodology.	The Reserved Matters application was refused and is at appeal.	Would push delivery back by 1 year, first completions 2018/19	-3
Land Adjoining The Tumbling Weir Hotel, Ottery St Mary	12/2770/MFUL AND 12/2771/MFUL AND 12/2772/MOUT AND 12/2773/OUT	Local Plan allocation redevelopment of former mill site. Not yet implemented and some elements still require reserved matters approval. Application (15/0571/FUL) recently approved (June 2015) for the removal of condition restricting demolition of buildings until contracts for redevelopment are let. This has been hampering marketing of the site and should enable the site to	No Reserved Matters application appears to have yet been submitted	1 year delay, first completions in 2017/18 rather than 2016/17. This would be consistent with approach calculated by EDDC on other sites where there is outline permission but no RM application (e.g. Land West of Hayne Lane, Land off Clapper Lane, Heathfield House on page 17 of report)	- 25

Comments on further submissions
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Site	Permission	EDDC commentary August 2015	Current position	Effect	Effect on 5 year HLSS
		now move forwards. Demolitions commenced July 2015. Developer in place for part of site (McCarthy & Stone). Expecting pre-application discussions for remainder of site soon. Assume completion will be from 2016/17 onwards in line with SHLAA methodology.			
Tithebarn Green, Land At Monkerton, Exeter And Redhayes/North Of Blackhorse, East Devon	12/1291/MOUT	Large site straddling the M5 between East Devon and Exeter. 580 of the proposed dwellings would be within the EDDC area. Site has outline permission and signed S106. Variation to S106 agreement reducing affordable housing on site from 28% to 25% being recommended for approval at August DMC. Reserved matters for northern end of the link road currently pending consideration (15/1515/MRES). Developer advises they expect to submit reserved matters for first residential parcel this year and recently submitted phasing plan discharging condition 22 of outline permission shows development of residential parcels 1 and 2 between 2016 and 2018. Linked application for Mosshayne development (14/2761/MOUT) has resolution to grant permission subject to S106 which is currently being negotiated. Both developments to be built out simultaneously to a total of 135 per annum as per email from developer.	No Reserved Matters application appears to have yet been submitted	1 year delay, first completions in 2017/18 rather than 2016/17. This would be consistent with approach calculated by EDDC on other sites where there is outline permission but no RM application (e.g. Land West of Hayne Lane, Land off Clapper Lane, Heathfield House on page 17 of report)	-70
Mosshayne	14/2761/MOUT	Allocation site on further land North of Blackhorse and to the East of Tithebarn Green. Planning application (14/2761/MOUT) resolved to approve subject to S106 Agreement. Developer intention is to build out simultaneous to Tithebarn Green to a total of 140 per annum. Once Tithebarn Green complete (2024/25) assumed Mosshayne build out rate increases in response.	The outline planning permission has still not been granted	Would push delivery back by 1 year, first completions 2017/18	-70
Pinn Court Farm Pinn Court Lane	12/0795/MOUT	Appeal allowed June 2015. Preapplication discussions regarding reserved matters have taken place, however no reserved matters application as yet. Recently submitted phasing schedule suggests phase 1 (150 dwellings) to start March 2016 and built out over three years with phase 2 (150 dwellings) starting in June 2019 and phase 3 (130 dwellings) starting in June 2022 so reasonable to assume first completions in 2016/17 and a rate to allow 150 completions by June 2019. Assume SHLAA compliant 12 dwellings for year 1 then remaining 138 to be delivered over the following 27 months to June 2019 = 5.11 per month = 61.33 per annum so assume 61 maximum build out per year. Future years (beyond June 2019) build out reduced to 50 per annum in line with submitted phasing schedule.	No Reserved Matters application appears to have yet been submitted	1 year delay, first completions in 2017/18 rather than 2016/17. This would be consistent with approach calculated by EDDC on other sites where there is outline permission but no RM application (e.g. Land West of Hayne Lane, Land off Clapper Lane, Heathfield House on page 17 of report)	-56
					-249

Housing supply- sites within 10km of Special Protection Areas (SPAs)

In addition to the adjustments for delivery for the sites set out in Table 3 above, the projected five year land supply includes a total of 391 dwellings on sites within 10km of the Exe Estuary and Pebblebed Heaths Special Protection Areas (SPAs) which will require mitigation. These sites are listed in Table 1 of PSD2015s as follows:

- Former Rolle College Campus Exmouth – 37 dwellings
- Goodmores Farm Exmouth – 62 dwellings
- Winslade Park Clyst St Mary - 62 dwellings
- Lympstone Nurseries Lympstone – 6 dwellings
- The Knowle Sidmouth – 62 dwellings
- Manstone Depot Sidmouth – 20 dwellings
- Port Royal Sidmouth – 30 dwellings
- Cranbrook expansion areas (Farlands site) – 112 dwellings

Although an updated Habitat Regulation Assessment report has been prepared and mitigation measures have been identified, delivery of these mitigation measures remains uncertain and the impact on the viability and deliverability of these sites has not been tested. Until such time as these mitigation measures have been tested and agreed with Natural England through the planning application process, these sites cannot be considered deliverable and should not be included within the 5 year land supply.

Housing supply- small sites and windfalls

The delivery rate for small sites set out in paragraph 3.7 of the Housing Monitoring Update to March 2015 (HMU) report appears to be very high, and assumes a total of 623 net new dwellings will be built out in the next 5 years, with the schedule at Appendix 1 indicating most of these will be delivered in by March 2017. This is considered unrealistic and does not reflect past rates. The table at paragraph 3.21 of the HMU shows that over the last four years, small sites (10 or fewer dwellings) have delivered at a rate of 98 dwellings per annum.

Furthermore, there is an element of double counting between the allowance for small sites and the windfall rate set out at paragraph 3.24 of the Housing Monitoring Update report.

A reasonable assumption would be that the windfall delivery rate of 130 per annum will apply to small sites with consent and additional windfalls would come forward from 2017/18, maintain the overall rate of 130 dwellings per annum going forward. Applying this correction to the housing delivery rates give a total allowance for small sites and windfalls of 650 within the five year land supply.

Housing supply- five year land supply calculations

The overall effect of these adjustments to the delivery assumptions on the five year land supply for East Devon is shown in Table 4. Even with no allowance for the deficit in housing provision between 2008 and 2013, the five year housing land supply is marginal at best.

Allowing for the deficit of between 1,461 and 4,023 dwellings to be made up within the first five years of the plan period, the housing land supply on adoption of the plan (including allocations without permission and windfalls) is between **3.8** and **2.7** years, well below the five year requirement.

Table 4: Five year land supply with revised delivery assumptions

	Item	Calculation	No allowance for deficit as per EDDC	Deficit based on SHMA	Deficit based on Adopted LP	Deficit based on SW RSS	Deficit based on Revised Draft LP
A	Requirement		17100	17100	17100	17100	17100
A1	Deficit			1461	2574	3358	4023
B	Annual requirement (before deficit is taken into account)	A/18	950	950	950	950	950
C	5 year requirement (including difecit)	Bx5+A1	4750	6211	7324	8108	8773
D	Requirement to have been delivered by 31 March 2015	Bx2	1900	1900	1900	1900	1900
E	Completions 1 April 2013 - 31 March 2015		1913	1913	1913	1913	1913
F	Shortfall/surplus	D-E	-13	-13	-13	-13	-13
G	5 year requirement (exluding buffer)	C+F	4737	6198	7311	8095	8760
H	5 year Target (including 5% buffer)	Gx1.05	4974	6508	7677	8500	9198
I	5 year Target including 20% buffer	Gx1.20	5684	7438	8773	9714	10512
J	Annual Target (including 20% buffer)	I/5	1137	1488	1755	1943	2102
	Supply elementat 30 Sept 2014 expected to deliver 1 April 2015 - 31 March 2020						
K	Extant permissions (including under construction)		4897	4897	4897	4897	4897
L	Site with resolution to grant permission		883	883	883	883	883
M	Strategic allocations		528	528	528	528	528
N	Future windfalls (adjusted for delivery)		27	27	27	27	27
N1	Adjustment to delivery rates to allow for RM and s106		249	249	249	249	249
N2	Adjustment to delivery rates to allow for uncertainty over SPA mitigation		391	391	391	391	391
O	Total deliverable supply	K+L+M+N-N1-N2	5695	5695	5695	5695	5695
P	Total deliverable supply (excluding allocaitons without permission or windfalls)	K+L-N1	5531	5531	5531	5531	5531
Q	Total deliverable supply (excluding allocaitons but including windfalls)	K+L+N-N1	5558	5558	5558	5558	5558
R	Surplus/Defecit	I-O	-11	1743	3078	4019	4817
S	Surplus/Defecit (excluding allocations without permission or windfalls)	i-P	153	1907	3242	4183	4981
T	Surplus/Defecit (excluding allocations without permission but including windfalls)	I-Q	126	1880	3215	4156	4954
U	Years of land supply	O/J	5.01	3.83	3.25	2.93	2.71
V	Years of land supply (excluding allocations without permission or windfalls)	P/J	4.87	3.72	3.15	2.85	2.63
W	Years of land supply (excluding allocations without permission but including windfalls)	Q/J	4.89	3.74	3.17	2.86	2.64

4. Proposed changes to the East Devon Local Plan

We consider that the Plan as proposed to be modified remains unsound. As well as failing to address the shortfall in housing provision and lack of deliverable housing sites, the further changes to the Local Plan set out in the EDDC Report of Additional Work (PSD2015r) fail to address significant concerns with regard to the proposed distribution of development in the spatial strategy. In particular, the significant concerns highlighted at the Examination hearings in relation to the level of growth proposed for the small towns and larger villages, which is set to drop from 10% of the overall total to 7% as a result of EDDC's proposed modifications.

In order to address these concerns the following amendments to the plan are suggested:

- An increase in the overall level of development from 18,300 to 19,800 for the period 2013 to 2031;
- Increase the level of development outside the West End by at least 1,200 dwellings, with the focus of additional growth on the smaller town and villages;
- The designation of Built up Area Boundaries proposed for the East Devon Village DPD to include site allocations at sustainable locations;
- Identification of additional site allocations in order to provide a 5 year supply of deliverable housing sites from the date of adoption of the plan.

Suggested amendments to the policy wording are set out as follows:

Strategy 1 - Spatial Strategy for Development in East Devon:

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

1. A minimum of ~~47,100~~ 19,800 new homes in the 2013 to 2031 period; and
2. Development on around 150 hectares of land for employment purposes.

The overall spatial development approach is as set out below:

1. East Devon's West End will accommodate significant residential development and major employment development to attract strategic inward investment along with supporting infrastructure and community facilities.
2. The seven main towns of East Devon will form focal points for development to serve their own needs and the needs of surrounding rural areas.
3. The Local Plan will set out how development in or adjacent to smaller towns, villages and rural areas will ~~be geared to meeting local needs~~ with further site allocations identified through a subsequent Development Plan Document.

Strategy 2 – Scale and Distribution of Residential Development:

An additional column to be added to the table in Strategy 2 (in place of the 'non Strategic Allocations column), and the overall total increased accordingly, as follows:

Settlement	<u>Allocations to be identified in future DPD</u>
<u>Villages & Rural Areas (including development adjoining Lyme</u>	<u>At least 1,200</u>

Regis)	
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Strategy 27 - Development at the Small Towns and Larger Villages:

The following settlements vary in size and character but all offer a range of accessible services and facilities to meet many of the everyday needs of local residents and they have reasonable public transport. They will have a Built-up Area Boundary that will be designated in the East Devon Village DPD ~~though they will not have land specifically allocated for development~~ and additional allocations will be identified in the DPD for at least 1,200 homes in or adjacent to these settlements.

- Beer
- Broadclyst
- Chardstock
- Dunkeswell
- Clyst St Mary
- Colyton
- East Budleigh
- Feniton
- Kilmington
- Lyme Regis
- Lympstone
- Musbury
- Newton Poppleford
- Sidbury
- Uplyme
- West Hill
- Whimble
- Woodbury

Until such time as the DPD is adopted, sustainable sites of an appropriate scale to the town or village and its growth needs will be considered favourably having regard to other policies in the plan.

If communities wish to promote development other than that which is supported through this strategy 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.