

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 2: EAST DEVON LOCAL PLAN 2013 TO 2031 FORM & CONTENT CHECKLIST

Introduction

The Planning Advisory Service (PAS) has produced a Local Plan Route Mapper & Toolkit to assist local planning authorities in undertaking a review and update of local plan policies. Part 2 of the Toolkit comprises a table setting out the requirements of the National Planning Policy Framework (NPPF, February 2019) – this part can be used to inform the decision on whether or not local plan policies still reflect national policy. The following table (Toolkit Part 2) identifies a total of 98 requirements in the NPPF. Column ‘C’ assesses the East Devon Local Plan 2013 to 2031¹ against each requirement, colour coded as below:

Local Plan meets NPPF requirement
Local Plan partially meets NPPF requirement
Local Plan does not meet NPPF requirement

Findings

Whilst much of the Local Plan meets NPPF requirements, there are many aspects of the NPPF which are not fully reflected. This is not surprising since the Local Plan was adopted three years prior the latest version of the NPPF. The findings indicate that the Local Plan meets 35 NPPF requirements, particularly in the sections relating to General requirements, Plan content, Healthy and safe communities, and Transport. The chapters where the Local Plan only partially meets NPPF requirements generally fall within Housing, Economy, Communications, Natural environment, Effective use of land, and Design. The Local Plan does not meet 15 requirements, mainly for the NPPF chapters on Town centres and Climate change.

Overall, this assessment shows that the East Devon Local Plan 2013 to 2031 does not fully reflect the requirements of the NPPF. Therefore, it is recommended that the Local Plan is revised to address this matter.

¹ The Villages Plan and ‘made’ neighbourhood plans are also considered, as they are part of the ‘development plan’ for East Devon alongside the Local Plan.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
<i>General Requirements</i>			
1.	Include any relevant material that is set out in a government policy statement(s) for the area for example a national policy statement(s) for major infrastructure and written ministerial statements.	NPPF Para 5, 6	East Devon is not specifically mentioned in national policy statements for major infrastructure and written ministerial statements.
2.	Contribute to the achievement of sustainable development.	NPPF Para 8, 9, 16	In general, the Local Plan meets this requirement (and specifically through Strategy 3 – Sustainable Development). The Villages Plan contributes to achieving sustainable development through policy for the 15 villages and the centres of Beer and Colyton (policies VP01, Beer 01, Colyton 01). LP meets NPPF requirement.
3.	Apply the presumption in favour of sustainable development.	NPPF Para 11	The Local Plan positively meets development needs, containing strategic policies that provide for objectively assessed needs. The strategy, scale, and distribution of development across the district is set out in Local Plan Strategy 1 and 2, with further detail in settlement and allocation specific policies (such as Strategy 12, 20, 22, 23, 24, 25, 26). LP meets NPPF requirement.
4.	Provide a positive vision for the future; a framework for addressing housing needs and other economic, social and environmental priorities.	NPPF Para 15	The Local Plan positively addresses housing needs and other priorities, particularly in Strategy 1, 2, and 3, but also across a range of other policies. The Villages Plan provides a positive vision and addresses needs for the 15 villages and the centres of Beer and Colyton (policies VP01, Beer 01, Colyton 01). LP meets NPPF requirement.
5.	Plans should be: Aspirational and deliverable	NPPF Para 16	The spatial strategy (LP Strategy 1) and scale and distribution of development (Strategy 2) are supported by a

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
	<p>Contain clear and unambiguous policies Accessible through the use of digital tools Serve a clear purpose avoiding duplication</p>		<p>range of allocation and settlement specific policies that are aspirational and deliverable. In general, policies are clearly written and unambiguous, but some would benefit from revision to better achieve this e.g. Strategy 3 and 4 contain relatively generic ‘objectives’ rather than being clear on how a decision maker should react to development proposals.</p> <p>The Local Plan and its policies maps, the Villages Plan, and neighbourhood plans are available online as PDF documents. There is also an interactive policies map for the Local Plan which includes an address search function and the ability to control layers being shown. The use of an ‘interactive’ Local Plan can be considered in its revision to assist public involvement and policy presentation.</p> <p>There are 121 policies in total in the Local Plan (53 strategic, 68 non-strategic), and there is some duplication between the matters covered by strategic and non-strategic policies e.g. Strategy 48 –‘Local Distinctiveness in the built environment’ duplicates aspects of policy D1 – ‘Design and Local Distinctiveness’; Strategy 32 sets out the circumstances where changing the use of employment land, social or community facilities will be allowed, and Policy E14 has a similar approach for shops, Post Offices, Pubs or other community services. There is also some duplication with policies in the NPPF (e.g. policy RC1 largely repeats NPPF para 97), and it should be considered whether this is “unnecessary duplication” (NPPF para 16f).</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			<p>There are currently 17 made neighbourhood plans – there is some duplication between NP policies and those contained in the Local Plan and NPPF. The most commonly repeated policy is Strategy 35, with most NP's having some form of Affordable Housing Policy; there is also extensive repetition of community facility and open space policies (protecting and in respect of new ones), broadband provision and, to a lesser extent, landscape protection.</p> <p>Overall, the LP partially meets NPPF requirement.</p>
	<i>Plan Content</i>		
6.	Include strategic policies to address priorities for the development and use of land. They should set out an overall strategy for the pattern, scale and quality of development.	NPPF Para 17, 20	Part One of the Local Plan contains a series of strategic policies (Strategy 1 – 50) that address the priorities for the development and use of land, setting out the overall strategy for the pattern, scale and quality of development. Strategy 1 identifies the scale of housing and employment development to be delivered over the plan period (2013 to 2031), and includes the overall spatial development approach. The scale and distribution of development is detailed further in Strategy 2. Other strategic policies in Part One include land allocations, affordable housing, climate change, and infrastructure delivery. LP meets NPPF requirement.
7.	Outline which policies are 'strategic' policies	NPPF Para 21	The 'strategic' policies are clearly outlined as those set out in the Local Plan Part One – 'Strategic approach and policies'. LP meets NPPF requirement.
8.	Strategic policies should look ahead over a minimum 15-year period <u>from adoption</u> .	NPPF Para 22	The Local Plan (and strategic policies therein) was adopted in January 2016, with an end date of 2031 – meeting the

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			minimum 15 year period from adoption. LP meets NPPF requirement.
9.	Indicate broad locations for development on a key diagram, and land use designations and allocations on a policies map.	NPPF Para 23	The Local Plan key diagram identifies the level of development that is planned at the towns and West End, along with more modest development at rural settlements. The accompanying policies map contains the land use designations and allocations. LP meets NPPF requirement.
10.	Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period.	NPPF Para 23	Local Plan Strategy 1 identifies the scale of housing and employment development to be delivered over the plan period (2013 to 2031), meeting objectively assessed needs. The scale and distribution of development is detailed further in Strategy 2, with land allocations detailed in various other strategic policies (e.g. Strategy 12 – ‘Development at Cranbrook’, Strategy 13 – ‘Development north of Blackhorse/Redhayes,’ Strategy 14 – ‘Development of an urban extension at Pinhoe’). LP meets NPPF requirement.
11.	Include non-strategic policies to set out more detailed policies for specific areas.	NPPF Para 18, 28	Part Two of the Local Plan contains a total of 68 Development Management policies across a range of topics, including design standards, natural and historic environment, employment, recreation and community facilities, and transport. The Villages Plan includes specific policies for the 15 villages and the centres of Beer and Colyton (policies VP01, Beer 01, Colyton 01). There are currently 17 ‘made’ neighbourhood plans that also contain non-strategic policies relevant to the particular areas. Meets NPPF requirement.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
12.	Set out contributions expected from development, and demonstrate that expected contributions will not undermine the deliverability of the Plan.	NPPF Para 34, 57	Several policies in the Local Plan set out contributions to be expected from development. These include: Strategy 34 on the level and types of affordable housing required from development; Strategy 50 – ‘Infrastructure delivery’ ensures that infrastructure requirements arising from developments are met; Open space standards are in Strategy 43; habitat mitigation in Strategy 47; allocation/settlement specific policies identifying what should be delivered in particular areas e.g. Strategy 12 – ‘Cranbrook, Strategy 13 – ‘Development north of Blackhorse/Redhayes,’ Strategy 20 – ‘Development at Axminster’. The Local Plan was subject to viability assessment through the CIL evidence prepared at the time (a revised Local Plan would need to be supported by its own viability assessment). LP meets NPPF requirement.
<i>Housing</i>			
13.	Be informed by a local housing need assessment, conducted using the standard method in national planning guidance as a starting point.	NPPF Para 60	The Local Plan does not meet this requirement as it was adopted before the NPPF was published.
14.	Identify the size, type and tenure of housing needed for different groups.	NPPF Para 61	Local Plan Strategy 34 identifies the type and tenure of affordable housing. Policy H2 seeks a mix of dwellings or predominantly smaller dwellings, and encourages developers to make at least 10% of plots available for self/custom build. Strategy 36 requires accessible and adaptable homes, and care/extra care home provision. However, the Local Plan lacks information on some of the different groups in NPPF para 61 e.g. families with children, service families, people who rent their homes. LP partially meets this requirement.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
15.	Where a need for affordable housing is identified, specify the type of affordable housing required.	NPPF Para 62	Local Plan Strategy 34 identifies the type of affordable housing that is required, with a target of 70% social or affordable rent and 30% intermediate or other affordable housing. However, the NPPF Annex 2 revised the definition of affordable housing after the Local Plan was adopted, so the type of affordable housing required is not fully reflected in the Local Plan. LP partially meets this requirement.
16.	Expect at least 10% of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups	NPPF Para 64	The Local Plan does not meet this requirement as it was adopted before the NPPF was published.
17.	Set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.	NPPF Para 65	The Local Plan does not meet this requirement as it was adopted before the NPPF was published.
18.	Identify a supply of specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.	NPPF Para 67	Local Plan Strategy 2 sets out the scale and distribution of housing delivery in the West End, towns and rural areas, broken down by completions, under construction/extant permissions, acknowledged development potential, and strategic allocations. Appendix 2 includes a schedule of where housing is to be delivered over each year of the plan period (2013 to 2031), including from sources above and windfalls. However, sites for years one to five, or developable sites or broad locations for growth for years 6-10 or 11-15, are not identified. LP partially meets this requirement.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
19.	Identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; unless it can be demonstrated that there are strong reasons why the 10% target cannot be achieved.	NPPF Para 68	The Local Plan does not meet this requirement as it was adopted before the NPPF was published.
20.	Support the development of entry level exception sites, suitable for first time buyers, unless the need for such homes is already being met within the authority's area.	NPPF Para 71	The Local Plan does not meet this requirement as it was adopted before the NPPF was published.
21.	Include a trajectory illustrating the expected rate of housing delivery over the plan period, and requiring a buffer of 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan.	NPPF Para 73	Local Plan Appendix 2 includes a schedule of housing delivery by overall source (completions, extant permissions, acknowledged development potential, strategic allocations, windfalls) over each year of the plan period (2013 to 2031). This information is reproduced in the housing trajectory on LP page 35. LP meets this requirement.
22.	Be responsive to local circumstances and support rural housing developments that reflect local needs.	NPPF Para 77	Local Plan Strategy 35 supports rural exception sites that meet local needs. LP meets this requirement.
23.	Identify opportunities for villages to grow and thrive, especially where this will support local services.	NPPF Para 78	Local Plan Strategy 27 identifies 15 villages that will have built-up area boundaries (BUABs), where development will be accepted in principle (set out in Strategy 6). Strategy 27 also enables neighbourhood plans to promote community-led development. BUABs for the 15 villages have subsequently been adopted in the Villages Plan (policy VP01), which also contains policies that support the centres of Beer and Colyton (policies Beer 01 and Colyton 01). In addition, the following made NPs have identified new built-up area boundaries: Payhembury, Rockbeare.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			However, the BUABs are drawn tightly around the urban areas, limiting opportunities for villages to grow and thrive. LP partially meets this requirement.
24.	Avoid the development of isolated homes in the countryside unless specific circumstances are consistent with those set out in the NPPF.	NPPF Para 79	Local Plan Strategy 7 defines the countryside and restricts development in these locations. Policy H4 allows new homes in the countryside where there is an essential need for rural workers. Policy H6 allows replacement dwellings in the countryside, whilst NPPF para 79c relates to re-use of redundant or disused buildings. Other aspects of NPPF para 79 are not reflected in LP policy. LP partially meets this requirement.
<i>Economy</i>			
25.	Create conditions in which businesses can invest, expand and adapt.	NPPF Para 80	<p>In principle this is met through the overall LP vision and by numerous LP policies in combination, including the overall Spatial Strategy (strategy 1) to enable development to meet both major/strategic & local needs. 150 hectares of employment land in line with the spatial hierarchy, but provision is also made for non-allocated sites in built-up areas (Policy E2) and in limited circumstances, also in rural areas (E4, E5, E7). Naturally, this is caveated throughout by various criteria/requirements that could in some cases add to costs/impact viability/aspirations relating to business plans – e.g. high quality design, priority for brownfield locations, within BUABs etc, but these are all also in conformity with the NPPF.</p> <p>Despite the significant emphasis on attracting inward investment to the West End, business growth is facilitated /</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			<p>supported across the district. The need for change, diversification and exceptions are accommodated, as well as the necessary infrastructure provision. As noted in line 23 above, however, some BUABs are very tightly drawn and could perhaps impact meeting this NPPF requirement.</p> <p>Also, this is a very broad requirement and 5 years into plan implementation with changed economic circumstances & business working practices, it is considered difficult to assess it as fully met without further review. Therefore overall this is assessed as partially met.</p>
26.	Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.	NPPF Para 81	<p>The overall vision/strategy (the majority of economic growth focussed in the west end, with significant areas also in a number of the 7 main settlements and small scale development & diversification of the rural economy, with a focus on delivering jobs close to homes), is clear and based on sustainable development principles (supported by Strategy 1, 3, 4 & 31). However, elements of the vision are set out in different parts of the LP document and the requirement for clarity could be more fully met by having the economic strategy brought together in one place.</p> <p>Links with other strategy and policy is not met because the LP pre-dates work on the Local Industrial Strategy. It should therefore be reviewed for conformity with latest key economic strategy and policy, including the HotSW Local Industrial Strategy (awaiting Government sign-off at the time of writing) and & Productivity Strategy.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			Overall this requirement is assessed as partially met. In any review, could also consider whether: (1) the encouragement of “Sustainable economic development” in Strategy 3 should be more clear defined (2) heavily focusing economic development in the west end remains the most sustainable approach to growth going forward given changing working patterns/ business work practices and the declared “climate emergency”.
27.	Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.	NPPF Para 81	<p>The LP identifies strategic sites to match the strategy to meet identified / anticipated need. Strategy 1 identifies 150 ha for employment land allocated/committed. This is particularly focused on inward investment and around the west end (Strategies 9-18) but there are also significant allocations in several of the main towns e.g. Honiton & Exmouth (see Strategy 22 & 23) and more modest allocations in others. The LP explains that care was taken to ensure these met anticipated needs at the time, and not to ‘flood’ the market. There is also some phasing over the plan period (e.g. Strategy 12, 23 & 26). In addition, criteria are set for seeking to ensure employment provision is brought forward to meet needs (Strategy 12 & 31) and criteria in place through various policy for sites not allocated (e.g. E2, E5, E7). Strategy 32 also seeks to safeguard existing/allocated employment land for this use.</p> <p>However, whether anticipated needs over the plan period are still met, needs consideration of where we are with delivery/meeting needs now vs land supply. Certainly some strategic developments cited in the Plan are not going ahead</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			(intermodal freight terminal) or not as envisaged (Skypark slow to develop out; Cranbrook – limited employment provision / commercial uses to date). Therefore, LP partially meets this requirement.
28.	Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.	NPPF Para 81	<p>The LP takes an overall positive & proactive approach to enabling/facilitating development and acknowledges and seeks to address barriers to investment (particularly infrastructure, services, housing, & also skills), as far as it reasonably can. This is set out through the overall vision/spatial strategy and numerous Plan policies in combination (including housing, transport, communications, energy e.g. through strategy 2, 9, 11, 29 & 30, 40, Policy TC7 & TC8). More could perhaps be done to ensure internet connectivity as a vital supporting infrastructure (see also row 61 below). This is a stated aim and in strategy for the west end (S11, S12) and for Seaton in particular (S25) but there may be scope for a more general requirement as is common in the made (and emerging) NPs e.g. Beer.</p> <p>The LP has an Infrastructure Delivery Plan as a supporting document, the development of which informed the LP, and CIL has since been introduced to further delivery (n.b. Strategy 50 would merit from updated text in any review).</p> <p><i>(N.b. re. environment, as this is generally of very high quality, the Plan policies to ensure this is conserved and enhanced, may in some cases act as barrier to investment in terms of locational requirements and development costs, but this does not affect NPPF conformity)</i></p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			Overall the Plan is considered to meet the requirement but, after 5 years, implementation and changing economic context, there could be merit in more detailed review to assess effectiveness and whether more could be done.
29.	Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.	NPPF Para 81	<p>Plan aims to be flexible/take a pragmatic approach, whilst recognising East Devon has some significant constraints to development that will remain as constants – especially a high quality environment/ landscape setting. Numerous strategic and DM policy in combination offer a variety of sites and means for enabling economic development of all scales and types, alongside criteria which guide, but are not generally absolute or overly prescriptive. Accommodating needs not anticipated is therefore considered to be met (e.g. Strategy 31).</p> <p>Accommodating new/flexible practices is considered to be partially met. Re-use / conversion of rural buildings is enabled (D8, E5), and dual use of community facilities (RC7). Text recognises the role of live-work units and accommodating homeworking space, but this is only specifically referred to and within limited circumstances in Strategy 31. Consideration could be given to whether this could be more broadly supported, as in some made NPs (Budleigh Salterton, Dunkeswell). Likewise with telecoms as a key enabler (see comments line 28)</p> <p>Overall, assessed as partially met/worthy of review due to how rapid technology is changing together with the</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			locational/accommodation requirements of businesses and workers even since the LP was adopted.
30.	Recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.	NPPF Para 82	<p>The LP naturally focuses on the dominant sectors in the East Devon economy (tourism, agriculture, energy), with policy to support their growth/development & diversification. More generally, sites are allocated at a variety of scales/locations and policy to encourage and support employment generating uses (e.g. Strategy 1, policy E2).</p> <p>Despite change of wording in NPPF to include references to 'data driven' industries and B8 uses, the NPPF requirement is largely addressed through the 'west end' "cluster" (Strategy 1 & especially Strategy 9), together with strategic accessible allocations on the edge of other main settlements (Strategy 1), including for B uses in particular at the accessible location of Honiton (strategy 23) and at Sidmouth for B1 (strategy 26). Support for rural diversification and small scale economic development is also found (Strategy 1, E4 & E5). Land allocated/used for employment is protected (Strategy 32).</p> <p>Overall however there is limited reference to sectors in the LP e.g. Strategy 31 (future job/employment) makes no reference currently, and the plan makes an assumption that B1 uses are most desirable in creating skilled employment (p.33) and that "inward investment" is a desirable/priority sector. Supporting home-grown innovative businesses may need more recognition. Furthermore, although some of the sectors cited in this NPPF requirement may be of limited relevance to the East Devon economy outside the 'west end',</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			<p>more could be perhaps be done to encourage the development of networks linked to this cluster, to increase the value to the East Devon economy.</p> <p>Overall, the NPPF requirement is considered to be partially met and worth reviewed to see if more could be done to reflect this range of sectors, including those with most potential for the districts' economy. To fully assess, would need to consider if we have got a clear up-to-date understanding of the specific locational requirements of our key sectors; adequately supporting/facilitating any emerging key sectors; more for creative industries which does not appear to be specifically mentioned in Local Plan.</p>
31.	<p>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.</p>	<p>NPPF Para 83</p>	<p>The requirement to enable is largely met through key strategic policies in 1, 2 & 28. Agricultural and tourism-related businesses are specifically supported (see rows 32 & 33 below) alongside a suite of DM policies to support new development /expansion for rural businesses generally (D8, E2, E4, E5, E7, E14, E16, RC4).</p> <p>In line with other requirements of the NPPF, the scope for development in the rural area/open countryside is limited/carefully controlled, but is nevertheless, enabled. The LP focus on very small scale development to meet local needs only and focus on traditional rural businesses and diversification of those could however be argued to be more restrictive than the NPPF intention.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			<p>In addition, in terms of design, the Plan promotes both high quality and locally distinctive design, particularly through Strategy 38 & 35 and DM Policy D1. In conjunction with the policies above (e.g. E4 & E5), there is a strong emphasis on securing locally distinctive design, reflective of/using local style/materials. This is potentially different to and more restrictive than being “well designed”. This is often reinforced or extended further through NPs and could be considered to be more restrictive for business growth than the NPPF intends.</p> <p>For various reasons above, the NPPF requirement is considered to be largely met but worthy of review.</p>
32.	Enable the development and diversification of agricultural and other land-based rural businesses.	NPPF Para 83	<p>Diversification of rural enterprise, including agriculture, is specifically supported through the Vision (“<i>the rural economy will be a varied one</i>” and Strategy 28 (Sustaining & diversifying rural enterprises). There are also a suite of enabling DM policies: D7, D8, E4, E5, E15, RC4.</p> <p>Overall, the NPPF requirement is considered to be largely met, but should consider that other “land based businesses” other than agriculture require specific reference for full conformity – either in broad terms “agriculture and other land based businesses”, or specifically, e.g. forestry.</p>
33.	Enable sustainable rural tourism and leisure developments which respect the character of the countryside.	NPPF Para 83	As a key sector in East Devon’s economy, the LP seeks to support the tourism/leisure industry generally, whilst strongly protecting the countryside / coast, for both its intrinsic value

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			<p>as well as its essential role underpinning tourism. Strategy 33 (Promotion of Tourism) supports & encourages tourism development <u>throughout</u> the district. This makes reference to sustainability and the need for development to protect & complement the environment.</p> <p>LP strategy/policy generally directs tourism/leisure-related developments to the main centres/resorts and communities with a BUAB, as the most sustainable locations. This includes small towns & villages through the Villages Plan. In addition, there are a range of specific DM policies in the LP that enable/support limited/carefully controlled rural tourism development (E16, E19, E20, RC4 re. holiday accommodation/parks, visitor attractions & recreational facilities), together with those generally supporting the rural economy, including D8, E4, E5, E15. These typically include criteria regarding sustainability considerations and impact on landscape.</p> <p><i>N.b. In several places, the LP <u>may</u> go further than the NPPF by requiring development to not simply respect the character of the countryside, but to “conserve” and “enhance” it (see D8, Strategy 46?).</i></p> <p>Subject to consideration of this last point and also whether it would be appropriate for “sustainable rural tourism” and leisure development to be more explicitly referenced/cited in the various policies/supporting text, overall, the LP strategy and policy is assessed to meet this NPPF requirement in principle.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
34.	Enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.	NPPF Para 83	<p>This requirement is assessed as fully met as it is covered by numerous LP strategic & DM policies. Strategy 4 (Balanced Communities) in particular seeks to ensure a range of social, educational, green infrastructure, health and community facilities. Strategy 27, 32 & 43 are also relevant.</p> <p>Retention/development of community facilities/services is also a key theme of the LP settlement specific strategies, the Villages Plan, and also 'made' NPs.</p> <p>Relevant supporting DM policies in the LP are E5, E9, E12, E13, E14, RC1, RC2, RC5, RC6, RC7.</p> <p>Overall, the NPPF requirement is assessed as met. <i>(However, in any review of policy consider if RC5 & 6 are contradictory and if any clarification required of RC2 in terms of development this would/wouldn't relate to, and whether reference to art could be culture more generally)</i></p>
35.	Recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.	NPPF Para 84	<p>The LP recognises this and, although it has a strong focus on a hierarchical spatial strategy which prioritise development in the west end and main settlements, it does have strategy and numerous policies to enable controlled/small-scale development outside BUAB/in the countryside. Relevant strategies are Strategy 1 – 7 and 28. There are also numerous DM policies allowing for this NPPF requirement for small scale local proposals: D8, E4, E5, E7, E15, E16, E19, E20, RC2, RC4, RC5, RC6.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			<p>Locations accessible by public transport are preferred / encouraged, but the LP does not make this an absolute requirement. It recognises public transport is limited in much of East Devon and that sustainable development includes supporting social well-being and securing local jobs.</p> <p>With reference to the rest of paragraph 84 of the NPPF, not shown in the template, the LP does seek suitable alternatives or mitigation in these circumstances. Overall, the requirement is considered to be met fully.</p>
	<i>Town centres</i>		
36.	Define a network and hierarchy of town centres and promote their long-term vitality and viability.	NPPF Para 85	<p>The requirement is met as the Local Plan identifies seven main towns (Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Seaton and Sidmouth) with centres offering a wide range of goods and services. These are promoted and protected through strategic policies for each town which specifically mention town centres and development management policies.</p> <p>Cranbrook is identified as a town which will similarly offer a town centre providing 'a focal point for retail, business and leisure activities'. Once established, this town centre will be subject to the protective DM policies.</p> <p>Two large villages/small towns, Beer and Colyton, are identified in the Villages Plan as offering a range of retail facilities. These are protected through specific policies in the Plan.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			Although not a direct requirement of the NPPF it should be noted that the strategic and DM Policies do not take account of potential change of use occurring as a result of permitted development and the need to assess whether this could undermine the vitality and viability of town centres by introducing residential uses. This has the potential to undermine their function and that of the primary shopping frontages. If potential for a significant impact is identified, Article 4 directions should be considered.
37.	Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations.	NPPF Para 85	This requirement is met through policies E9 and E10 (and shown on policies map). E9 refers to the 1987 Use Classes Order and needs to be updated to say (as amended). In any Plan update, the town centre and primary shopping frontages should be reassessed. Once established, the extent of the town centre at Cranbrook will need to be identified, along with the primary shopping area.
38.	Retain and enhance existing markets and, where appropriate, re-introduce or create new ones.	NPPF Para 85	There is no existing reference to existing or potential markets in the text, despite a weekly market in Axminster and twice weekly market in Honiton. Therefore, this requirement is not met.
39.	Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.	NPPF Para 85	The Local Plan does not currently meet this requirement. The Plan currently identifies town centre sites (eg Webster's Garage at Axminster, Queen's Drive at Exmouth) in the relevant town strategies but these are not identified on the inset maps. It is unlikely that sufficient sites have been allocated to meet at least 10 years needs (as most towns do not have allocations, and those that have are identified as a

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			<p>result of their vacancy and potential for redevelopment rather than to meet a specific need).</p> <p>Evidence is required in order to ascertain what scale and type of development are likely to be needed.</p>
40.	Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.	NPPF Para 85	<p>Evidence is required in order to ascertain what scale and type of development are likely to be needed. Need for, and availability of, town centre sites has not been assessed.</p> <p>The Local Plan does not currently meet this requirement and it is not known whether there is a need for allocations. The Plan does contain E11 which establishes a sequential test for new retail and retail related uses in the towns.</p>
41.	Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.	NPPF Para 85	<p>This requirement is partially met. The Plan recognises the importance of residential uses on the upper floors of buildings in town centres through E13, however, as written, residential uses at ground floor level are unlikely to be acceptable in primary shopping frontages, and to a lesser extent in town centre shopping areas, due to the loss of retail provision and subsequent impact on vitality.</p> <p>Policy predates changes to the Use Classes Order which permit changes from shops and offices to residential as permitted development. The scale and potential impacts of this have not been assessed.</p>
<i>Healthy and safe communities</i>			

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
42.	Achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles.	NPPF Para 91	Strategy 3, Strategy 4, Strategy 43 and all of the DM policies in the Recreation and Community Facilities chapter of the Local Plan meet these requirements.
43.	Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.	NPPF Para 92	This is largely met through Strategy 3, Strategy 4, Strategy 43 and all of the DM policies in the Recreation and Community Facilities chapter of the Local Plan.
44.	Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.	NPPF Para 92	This is met through a combination of Strategy 3, Strategy 4, Strategy 10, Strategy 11, Strategy 12, Policies for individual towns (Strategy 20 to 26), Strategy 36 Accessible and Adaptable Homes and Care/Extra Care Homes, Strategy 43, Strategy 50 and RC5.
45.	Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.	NPPF Para 92	The protection of valued services and facilities is facilitated through Strategy 4, Policy E14 and Chapter 25 Recreation and Community Facilities, which includes policies on the retention of land for sport and recreation (RC1), the protection of allotments and (in certain circumstances) safeguarding community facilities from alternative uses.
46.	Ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.	NPPF Para 92	Shops, facilities and services in locations consistent with the spatial strategy of the Local Plan are encouraged through Policy E2, Policy E9, Policy E11, Policy E12, and Policy E14.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
47.	Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	NPPF Para 92	An integrated approach is fostered through Strategy 1, Strategy 3, and Strategy 4.
48.	Consider the social, economic and environmental benefits of estate regeneration.	NPPF Para 93	This is of little direct relevance to East Devon, which is a predominantly rural authority with few estate regeneration issues.
49.	Promote public safety and take into account wider security and defence requirements.	NPPF Para 95	This requirement is partly met through Strategy 37 where proposals for community safety are encouraged and residential proposals will be assessed against 'secured by design' principles. There is an operational defence site at Lypstone (Commando training base) but no specific policies apply to it. In addition to the town centres there is the potential for major gatherings at the Westpoint exhibition centre, major tourist attractions like Crealy Adventure Park and on the beaches, but again there are few policies relating specifically to proposed developments in these areas. Therefore, this requirement is only partially met.
50.	Provide open space, sports and recreational facilities which meets the needs of the local area.	NPPF Para 95	Strategy 43 Open Space Standards meets these requirements.
51.	Protect and enhance public rights of way and access.	NPPF Para 98	Enhanced pedestrian and cycle links are included in the plan, including in Strategy 10 and in the individual town chapters. RC4 seeks to protect rights of way in relation to some rural recreational developments. This requirement is partly met.
	<i>Transport</i>		

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
52.	Should actively manage patterns of growth in support of objectives in Para 102. Significant development should be focused on locations which are/can be made sustainable. Opportunities to maximise sustainable transport solutions will vary between urban and rural areas - this should be taken into account in plan-making.	NPPF Para 103	Local Plan Strategy 1 focusses development at the West End and seven main towns – locations which are, or are being made, sustainable. Other Local Plan policies promote sustainable transport (Strategy 5B, policy TC2), ensuring efficient, safe and accessible means of travel. Limited development in rural areas with less potential for sustainable travel is allowed through Local Plan Strategy 27, dwellings for rural workers (policy H4), small scale employment (E5), the Villages Plan. Therefore, the LP meets this requirement.
53.	Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.	NPPF Para 104	The large scale LP allocations include a mix of uses e.g. sites in the West End include employment, leisure, retail, education, and other community facilities (Strategy 12, 13, 14). LP meets this requirement.
54.	Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.	NPPF Para 104	LP Strategy 15 allocates land for an intermodal interchange to enable the transfer of goods between rail and road, although this has not been subsequently been developed. Policy TC5 safeguards disused railway lines in general which have potential for re-use as a transport and recreation route. Policy TC8 safeguards land for 8 identified highway and access schemes. Therefore, the LP meets this requirement.
55.	Provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).	NPPF Para 104	LP Strategy 5B ensures efficient, safe and accessible walking and cycling routes in general. Major development at the West End should provide high quality walking and cycling connections (Strategy 9, 11). Policy TC4 requires development to provide, improve and extend facilities for pedestrians and cyclists, but lacks reference to “high quality”. Policy TC8 safeguards land for several specific walking and

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			<p>cycling schemes, informed by Devon County Councils' Local Transport Plan. Policy TC9 states at least 1 bicycle parking space should be provided per home.</p> <p>Overall, the LP meets this requirement, but any revision should include more references to "high quality" walking and cycling networks.</p>
56.	Provide for any large-scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.	NPPF Para 104	LP Strategy 15 allocates land for an intermodal interchange to enable the transfer of goods between rail and road, although this has not been subsequently been developed. The LP recognises the importance of Exeter Airport expansion and encourages supporting infrastructure for its growth (Strategy 17). LP meets this requirement.
57.	Recognise the importance of maintaining a national network of general aviation airfields.	NPPF Para 104	Development should not prejudice the safe operation of protected aerodromes or affect public safety within the identified aerodrome safeguarded area around Exeter Airport and Dunkeswell Airport (policy TC12). But LP does not specifically recognise the importance of maintaining national network of general aviation airfields, so LP only partially meets this requirement.
58.	Provide adequate overnight lorry parking facilities, taking into account any local shortages.	NPPF Para 107	The LP does not mention lorry parking facilities, so this requirement is not met.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
59.	In assessing sites that may be allocated for development in plans, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.	NPPF Para 108	LP strategic allocations address transport issues e.g. major development at the West End (Strategy 9) seek high quality sustainable transport and improved highway provision; Axminster strategic allocation includes a north-south relief road for the town (Strategy 20). Therefore, the LP meets this requirement.
60.	Development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.	NPPF Para 109	LP policy TC7 prevents new development if the proposed access, or the traffic generated by the development, would be detrimental to the safe and satisfactory operation of the highway network. This is stricter than the NPPF requirement which prevents new development where there is an unacceptable or severe impact. Therefore, the LP partially meets this requirement.
<i>Communications</i>			
61.	Support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections, setting out how high-quality digital infrastructure is expected to be delivered and upgraded over time.	NPPF Para 112	LP Strategy 11 requires the highest quality data service infrastructure, especially broadband, at the West End; and Strategy 25 seeks improvements to broadband provision at Seaton. Policy TC1 sets out criteria on how applications for telecommunication systems will be considered. However, there is a lack of detail on next generation mobile technology and full fibre broadband connections, how high-quality digital infrastructure is to be delivered, and no general policy support for the expansion of electronic communications networks in the rest of East Devon. Therefore, LP partially meet this requirement.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
<i>Making effective use of land</i>			
62.	Promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.	NPPF Para 117	Local Plan Strategy 3 promotes sustainable development, including providing facilities to meet people's needs whilst conserving and enhancing the environment, and ensuring future generations live in a high quality environment. Strategy 4 supports balanced communities, and Strategy 37 supports community safety. LP policy RC7 ensures land is used efficiently and effectively by stating new community facilities should be capable of dual-use. There is a lack of detail on ensuring healthy living conditions, so the LP only partially meets this requirement.
63.	Set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.	NPPF Para 117	Strategy 3 states development should maximise the use of previously developed land, but limited detail on strategy for delivery (this is less of an issue in East Devon compared to urban authorities). Therefore, the LP does not fully meet this requirement.
64.	Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.	NPPF Para 118	Strategy 3 ensures sustainable development generally, and Strategy 4 promotes balanced communities. Strategy 5 includes a range of environmental measures. Major development at the West End (Strategy 9) and other large scale allocations (e.g. Axminster, Strategy 20) include a mix of uses, including open space, but net environmental gains is not explicitly mentioned. LP only partially meets this requirement.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
65.	Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.	NPPF Para 118	The LP does not include policies that meet this requirement (although arguably this is less of an issue in East Devon compared to urban authorities).
66.	Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.	NPPF Para 118	Local Plan Strategy 6 and Villages Plan policy 01 allow development in built-up area boundaries in principle, although this may not necessarily be brownfield land. Policy EN16 requires a contaminated land assessment where necessary, but policies do not support appropriate opportunities to remediate such land (this is less of an issue in East Devon compared to urban authorities). Therefore, the LP partially meets this requirement.
67.	Promote and support the development of under-utilised land and buildings.	NPPF Para 118	Local Plan Strategy 6 and Villages Plan policy 01 allow development in built-up area boundaries in principle, although this may not necessarily be under-utilised land and buildings (possibly because this is less of an issue in East Devon compared to urban authorities). Policy D8 supports the re-use of rural buildings outside settlements. Overall, the LP does not fully meet this requirement.
68.	Support opportunities to use the airspace above existing residential and commercial premises for new homes.	NPPF Para 118	The LP does not include policies that meet this requirement.
69.	Reflect changes in the demand for land.	NPPF Para 120	Strategy 32 sets out the circumstances where changing the use of employment land, social or community facilities will be allowed. Policy E14 has a similar approach for shops, Post Offices, Pubs or other community services. Policy RC1

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			permits the loss of land for sport and recreation in limited circumstances. LP meets this requirement.
70.	Support development that makes efficient use of land, taking into account the need for different types of housing and other forms of development, local market conditions, the availability and capacity of infrastructure and services, the character and setting of the area, and the importance of securing well-designed, attractive and healthy places.	NPPF Para 122	Strategy 3 promotes sustainable development, including providing facilities to meet people's needs whilst conserving and enhancing the environment, and ensuring future generations live in a high quality environment. Strategy 4 supports balanced communities. LP policy RC7 ensures land is used efficiently and effectively by stating new community facilities should be capable of dual-use. However, there is a lack of detail specifically on the efficient use of land, so the LP only partially meets this requirement.
71.	Avoid homes being built at low densities where there is an existing or anticipated shortage of identified housing needs, and where appropriate include the use of minimum density standards.	NPPF Para 123	Local Plan policy D1 ensures density relates well to its context. However, the LP does not explicitly avoid low densities or include minimum density standards. Therefore, the LP only partially meets this requirement.
	<i>Design</i>		
72.	Set out a clear design vision and provide maximum clarity about design expectations.	NPPF Para 125 & 126	<p>LP Policy D1 in general requires high quality distinctive design that relates well to local context. It sets out some aspects of detail and quality that should be incorporated, also some amenities and features that should not be adversely affected. More clarity and detail on how design expectations are to be met is required to comply with the NPPF and the new National Design Guide.</p> <p>The LP requires that design proposals have regard to local policy proposals including Village or Design statements and</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Assessment results
			<p>Neighbourhood plans, but more detail is required to meet NPPF requirement.</p> <p>The LP touches on design review but much more information, including examples of other methods (detailed in the emerging Design Guide SPD) can be provided to meet NPPF para 129 re. design tools.</p> <p>Overall, the Local Plan partially meets this requirement – restructured design policies to include the above would help to maximise clarity on expectations, along with more explanation on the impact of design on social, economic and environmental sustainability within the supporting text.</p>
73.	<p>Ensure that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe, accessible and inclusive.</p>	<p>NPPF Para 127</p>	<p>Policy D1 incorporates many of these aspects of urban design, but does not specifically mention some - including function within the wider area, being visually attractive, maintaining a strong sense of place and sustaining an appropriate mix of development. (LP policy H2 relates to housing mix only).</p> <p>The LP therefore only partially meets the requirement.</p>

<i>Green Belt</i>			
74.	Set out proposals for new Green Belts within strategic policies. This should demonstrate why normal planning and development management policies would not be adequate, any major changes in circumstances, consequences for sustainable development, the need for Green Belt to support adjoining areas, and how new Green Belt would meet other objectives of the Framework.	NPPF Para 135	N/A – there is no Green Belt in East Devon.
75.	Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans. Even when exceptional circumstances are demonstrated strategically to take land out of the Green Belt, it is still necessary to demonstrate that exceptional circumstances exist at the site level.	NPPF Para 136	N/A – there is no Green Belt in East Devon.

76.	<p>Strategic policies should make as much use as possible of suitable brownfield sites and underutilised land and optimise the density of development including promoting an uplift in minimum density standards in town and city centres and locations well served by public transport. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.</p>	<p>NPPF Para 137 & 138</p>	<p>N/A – there is no Green Belt in East Devon.</p>
77.	<p>When defining Green Belt boundaries, plans should ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development, not include land which it is unnecessary to keep permanently open, identify areas of safeguarded land between the urban area and the Green Belt where necessary, make clear that the safeguarded land is not allocated for development at the present time, be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period, and define boundaries clearly.</p>	<p>NPPF Para 139</p>	<p>N/A – there is no Green Belt in East Devon.</p>

<i>Climate change, flooding and coastal change</i>			
78.	Take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperature.	NPPF Para 149	Elements of these requirements are included in Strategy 3, Strategy 38, and policy D1. The Local Plan also includes specific policies covering the other issues (e.g. flood risk policies EN21,22; coastal change policy EN25; biodiversity in Strategy 47; landscape in Strategy 47), but does not explicitly link all of these issues with climate change. Therefore, this requirement is only partially met.
79.	Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.	NPPF Para 149	These requirements are partly met through the Climate Change chapter, which includes policies on sustainable design and construction (Strategy 38), renewable and low carbon energy projects (Strategy 39), decentralised energy networks (Strategy 40) and allowable solutions (Strategy 41).
80.	Increase the use and supply of renewable and low carbon energy and heat by providing a positive strategy for energy from these sources, identifying suitable areas for renewable and low carbon energy sources, and identifying opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.	NPPF Para 151	Strategy 3, The Development at East Devon's West End, and the Climate Change chapter help to provide a positive strategy for renewable and low carbon energy and heat e.g. through district heating for new development in the West End in Strategy 11. However, limited detail outside the West End, so this requirement is partially met.
81.	Strategic policies should manage flood risk from all sources.	NPPF Para 156	Policy EN21 addresses River and Coastal Flooding, but does not mention surface water flooding. In addition, critical drainage areas were identified after the Local Plan was adopted. Therefore, this requirement is not met.
82.	Avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.	NPPF Para 167	Strategy 45 supports sustainable coastal management and seeks to reconcile the interests of the World Heritage Site to allow erosion with the protection of coastal communities. EN25 is an 'interim' policy to allow 'roll-back' in certain circumstances until Coastal Change Management Areas can be defined. Neither policy meet the NPPF requirement to avoid inappropriate development in vulnerable areas. However, work is underway on

			the definition of areas likely to be affected by physical changes to the coast as Coastal Change Management Areas.
	<i>Natural environment</i>		
83.	Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.	NPPF Para 170	This requirement is met by the following strategies: Strategy 5- Environment Strategy 44- Undeveloped Coast and Coastal Preservation Area Strategy 46- Landscape Conservation and Enhancement and AONB's Strategy 47- Nature Conservation and Geology
84.	Plans should: distinguish between the hierarchy of international, national and locally designated sites, 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 scale across local authority boundaries.	NPPF Para 171	This requirement is met. Strategies 5 and 47, in particular, set out measures for protection of international, national and locally designated sites and measures to enhance and maintain networks of habitats and green infrastructure. There are also a number of policies which address particular aspects of this requirement- for example the protection of local nature reserves, county wildlife sites and county geological sites through Policy EN4. Policy also addresses the need to protect and increase the networks of green spaces in particular locations, for example through EN2 The Valley Parks, Exmouth; and EN23 Land at the Byes, Sidmouth. The hierarchy of sites is alluded to in policy but explicitly set out and explained in the supporting justification. Similarly, the requirement to plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries is addressed in detail in the supporting text and through evidence documents- such as the AONB Management Plans and the DCC Landscape Character Areas Assessment- referred to in Strategy 46.
85.	Conserve the special character and importance of Heritage Coast areas.	NPPF Para 173	A combination of these two Strategies will conserve and protect the special character and importance of Heritage Coast areas:

			Strategy 44- Undeveloped Coast and Coastal Preservation Area protects the setting of the heritage coastline; and Strategy 45- Coastal Erosion recognises the integrity and outstanding universal value of the World Heritage Site and allows the processes that created it to continue, subject to considering the needs of coastal communities and any possible mitigation. However, “Heritage Coast” is not specifically mentioned in Local Plan policy so this requirement is only partially met.
86.	Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, 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.	NPPF Para 174	This requirement is partly met through Local Plan policy, as the requirement to secure measurable net gains for biodiversity was introduced after the Plan had been adopted and a means to achieve this is not, therefore, set out in the Plan. Some Neighbourhood Plans, for example Ottery St Mary, have identified habitats at a more local level than the Local Plan.
87.	Ensure that a site is suitable for its proposed use taking account of ground conditions, any risks arising from land instability and contamination, and the likely effects of pollution on health, living conditions and the natural environment.	NPPF Para 178 & 180	This requirement is partially met by Policies EN14 and EN16. Ground instability is not referred to and would need to be addressed in order for the plan to be NPPF compliant. Other Policies may have a peripheral relevance- EN18- Maintenance of Water Quality and Quantity and EN17 Notifiable Installations.
88.	Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.	NPPF Para 181	This is met by Policy EN14 and, more specifically, it’s reasoned justification. Values are not specified, but the supporting text makes it clear that developments in Air Quality Management Areas should be consistent with the local air quality action plan. Honiton is highlighted in the ‘Towns’ section as having potential air quality concerns although this is not identified as a particular issue in Strategy 23.

89.	Ensure that new development can be integrated effectively with existing businesses and community facilities.	NPPF Para 182	<p>A number of Strategies and providing a mix of development is a central theme to the Plan. Amongst many policies which require effective integration, Strategy 3, Strategy 4- and Strategy 5 set out a strategic framework and are particularly relevant. Strategy 31 requires employment to be provided alongside homes in large scale developments. Strategy 32 resists the loss of employment, retail and community sites and buildings to other uses.</p> <p>However, NPPF para 182 relating to ‘agent of change’ is not included in the Local Plan, so this requirement is not met.</p>
<i>Historic Environment</i>			
90.	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.	NPPF Para 185	<p>LP Strategies 48 and 49 and supporting text provide general dialogue on the importance of conserving and enhancing the historic environment, local distinctiveness and the use of local materials, which does not fully meet the NPPF requirement. LP policies can be rewritten to reflect the Heritage Strategy (adopted after the LP) and include information on the new List of Local Heritage Assets. More detail can also be provided on how the strategy takes into account para 185 points a) – d).</p> <p>The LP has a target to reduce the number of heritage assets at risk and the Villages Plan reflects this as a target within Village BUABs.</p>
<i>Minerals</i>			
91.	Provide for the extraction of mineral resources of local and national importance.	NPPF Para 204	N/A – the approach to Minerals development is set out in Devon County Council’s Minerals Plan 2011-2031, and is not within the remit of East Devon District Council.

92.	Take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials.	NPPF Para 204	N/A – the approach to Minerals development is set out in Devon County Council's Minerals Plan 2011-2031, and is not within the remit of East Devon District Council.
93.	Safeguard mineral resources by defining Mineral Safeguarding Areas.	NPPF Para 204	N/A – the approach to Minerals development is set out in Devon County Council's Minerals Plan 2011-2031, and is not within the remit of East Devon District Council.
94.	Encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place.	NPPF Para 204	N/A – the approach to Minerals development is set out in Devon County Council's Minerals Plan 2011-2031, and is not within the remit of East Devon District Council.
95.	Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals, the manufacture of concrete and concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.	NPPF Para 204	N/A – the approach to Minerals development is set out in Devon County Council's Minerals Plan 2011-2031, and is not within the remit of East Devon District Council.
96.	Set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health	NPPF Para 204	N/A – the approach to Minerals development is set out in Devon County Council's Minerals Plan 2011-2031, and is not within the remit of East Devon District Council.
97.	Recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction	NPPF Para 204	N/A – the approach to Minerals development is set out in Devon County Council's Minerals Plan 2011-2031, and is not within the remit of East Devon District Council.
98.	Ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high-quality restoration and aftercare of mineral sites takes place.	NPPF Para 204	N/A – the approach to Minerals development is set out in Devon County Council's Minerals Plan 2011-2031, and is not within the remit of East Devon District Council.