

Agenda Item

Executive Board

16 August 2006

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Regional Spatial Strategy

Summary

This draft regional spatial strategy for the South West has been produced by the South West Regional Assembly a partnership of Councillors from all Local Authorities in the regions and various other representatives of the region. This document is a new approach to planning for the South West and is intended to influence how we live, work and travel in the region for the next 20 years. The overall purpose of the plan is to manage the nature, location, scope and pace of development from 2006 – 2026 in the interests of current and future residents.

This consultation exercise finishes on the 30 August 2006 and all those with an interest in shaping the future of the region and in particular their own sub-region are being invited to make comment on the policies proposed. The report deals with each section of the document with individual recommendations throughout. It is proposed that this be amalgamated to form the overall response of East Devon District Council.

Recommendation

That the recommendations contained within this report are agreed as the formal response of East Devon District Council to the Draft Regional Spatial Strategy as published by the South West Regional Assembly.

a) Reasons for Recommendation

In order to respond to the consultation exercise currently being undertaken by the South West Regional Assembly on the future of the region to 2026. Failure to take part in this process will prevent any views of East Devon District Council being taken into account in the drawing up of the final document.

b) Alternative Options

Individual recommendations can be altered to meet the requirements of the Executive Board or the Council could choose not to make a consultation response at all.

c) Risk Considerations

The Draft Regional Spatial Strategy for the South West 2006 – 2026 is the key document which sits above the district and unitary Local Development Frameworks and it will be necessary to achieve conformity with those policies in order for the LDF documents to be adopted. It is therefore imperative that important issues for East Devon are built into the RSS at this stage.

d) Policy and Budgetary Considerations

There are no budget implications to this document and it is a policy document which is being consulted on.

e) Date for Review of Decision

N/A

1.0 Introduction

- 1.1 The draft Regional Spatial Strategy (RSS) for the South West 2006/07 was published by the South West Regional Assembly which is a partnership of Councillors from all Local Authorities in the Region and representatives of various sectors with a role in the region's economic, social and environmental well-being, on 5 June 2006. The South West Regional Assembly submitted the Draft RSS for the South West to the Government on 24 April 2006 and consultation on behalf of the independent panel of Inspectors runs from 6 June to 30 August 2006.
- 1.2 The Draft RSS document and further information on the consultation can be found on the Regional Assembly's website at www.southwest-ra.gov.uk. Copies of the Draft RSS have been held in the Member's area or can be obtained from the Planning Department.
- 1.3 The Draft RSS will, when adopted, replace the existing Regional Planning Guidance (RPG10) for the South West and the Devon Structure Plan. The strategy timetable reveals that an examination in public is likely to take place in spring 2007 followed by the publication of the panel report and a further round of consultation on a revised RSS in early 2008.
- 1.4 As a Local Planning Authority responsible for the production of a Local Development Framework (LDF) it is necessary for us to take into account the content of the emerging RSS and once the Strategy is adopted to ensure that our LDF conforms with it. In the interim, under the Government's transitional arrangements our policies are required to be consistent with the Devon Structure Plan to 2016 which has been 'saved' until September 2007.

2.0 The South West Region Today

- 2.1 Geographically, the South West is the largest of the English regions. The north of Gloucestershire is as close to Scotland as it is to Lands End in Cornwall. The population is about 5 million with the largest proportion of old people of any English region and this is set to increase in the future. The population is also dispersed with around 35% living in settlements of fewer than 10,000 people and a higher proportion of very small villages than any other region. Some parts of the region are very sparsely populated and accessibility varies. The larger urban areas such as Bristol, Plymouth, Bournemouth and Swindon, are the most significant employment locations and this role is of increasing importance. Many of the region's smaller towns also play an important role as key service centres and transport hubs serving rural hinterlands. The South West faces some real challenges now and in the future and many of these relate to or are worsened by its geography and characteristics.

3.0 The New Regional Spatial Strategy

- 3.1 The RSS looks forward to 2026 and is designed to manage the change and development of the South West that it will need if it is to rise to the challenge of a growing population and play its role in National and Regional prosperity. It is a new kind of strategy – spatial and functional in approach – responding to the Government's challenge to build sustainable communities. "Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they can function". (Reference: Planning Policy Statement 1 - Delivering a Sustainable Development).
- 3.2 The RSS will influence the future planning of the region in a number of ways:-
 - As part of the Development Plan system it provides guidance on the location and scale of development for interpretation in Local Development Frameworks (LDFs).
 - It guides investment in transport and provides a framework for the preparation of Local Transport Plans (LTPs).
 - It provides a spatial context of the plans, programmes and investment of other agencies and organizations in the South West.

4.0 What Sort of Region does the RSS Propose?

4.1 The regional future this strategy is working towards can be summed up as one where:-

- All communities enjoy the benefits of further development and where housing needs are satisfied.
- The economy continues to prosper.
- Rural parts of the region fulfil their economic potential with vibrant market towns at their core.
- Bristol becomes a major European city.
- Plymouth continues its renaissance and becomes the economic hub of the far South West.
- Swindon, Exeter, Cheltenham/Gloucester, Bournemouth/Poole, Weston-Super-Mare and Taunton develop as important focal points for economic growth.
- Regeneration of the Cornwall towns, Forest of Deane and Torbay and other priority areas continues to have effect.
- Growth is supported by necessary infrastructure in step with development.

5.0 Major Challenges that the Region Faces

5.1 The momentum of change in the South West looks set to continue. Unless it is planned for in a constructive and creative manner with sustainable development at the heart of the strategy, growth has the potential to erode the very quality of life that makes the region distinctive. There has been much debate in the region about the direction of travel the South West should take. At the heart of this strategy is the desire to create a region that is more sustainable than it has been, with better balanced and more sustainable communities within it. The RSS endorses the vision for the region set out in the Regional Sustainable Development Framework:-

“The South West must remain a region with a beautiful and diverse environment. By working together and applying the principles of sustainability we can achieve lasting economic prosperity and social justice while protecting the environment. This approach will secure a higher quality of life now and for future generations”.

5.2 The Draft RSS is intended to plan positively for the extra ½ million people expected in the region during the plan period by seeking to maximise the benefits of the necessary growth. It also recognises climate change as a cross-cutting issue that requires measures to adapt to and mitigate the effects of change by tackling the dispersal of development, promoting sustainable use of resources (and sustainable construction as the norm) and identifying areas and infrastructure vulnerable to change. In combination with the Regional Housing Strategy it determines the broad location and rates of new housing development throughout the region as well as looking at the issues of affordable housing. The Draft RSS through its development policy seeks to ensure that opportunities for realising the economic potential of the Region are not missed in the face of competitive pressures from elsewhere in the UK and overseas. In aligning with the Regional Economic Strategy it determines the whereabouts of new development, regeneration and infrastructure as a means to encourage economic development and targets regeneration to address these disparities. The priorities are intended to guide development investment to places of greatest need. It seeks to use developments for all communities in the Region recognising that to encourage some of the larger settlements to grow to assist service provision by achieving economies of scale and maximising accessibility. The Spatial Strategy sets out the approach to service provision and accessibility. The Strategy seeks to ensure that wherever development takes place in the region, services are planned in step with that development. It contains a Regional Transport Strategy which provides a framework for new investment to bring about a step change in public transport alongside stronger demand management measures for car use in the region's cities and towns. The overall development strategy is designed to ensure that development can play its full part in tackling inequality.

5.3 Looking specifically at the sub-region around Exeter, there has been strong growth in new jobs in this area substantially above regional and national rates. During the period 1996 – 2002 the sub-region experienced a 24% increase in employment. This compares with

increases of 14% for GB and 16% in the South West. This has been reflected in the recent high rates of take-up of strategic employment land.

- 5.4 In the sub-region there are about 185,000 households of which just over half are either married or co-habiting couples. Just under one third of all households for single persons with an average household size of 2.25 showing a general fall over recent years. The current dwelling stock in the area has totals of 172,000 and this has been increasing at a rate of about 1800 per annum i.e. an annual increase in dwelling stock of approximately 1%. In terms of recent development distribution, only about one third of completions have been located in Exeter.

6.0 Section One – A Sustainable Future for the South West

- 6.1 The South West ecological footprint is unsustainable as it stands and energy consumption is a significant contributor to the region's eco footprint. Minimising the level of demand for energy through improving energy efficiency is a major challenge as is the development of more renewable energy sources in the region. The draft RSS provides targets and policy guidance to increase its supply moving from the current position of about 3% compared to a national target of 20% by 2020. The intention is also to reduce green house gas omissions at least in line with current national targets i.e. by 30% by 2026 (compared to 1990 levels). Planning Authorities will need to include policies in their strategies, plans and programmes to assess how all new developments, regeneration areas and major refurbishments contribute to stabilising and reducing the region's ecological footprint. It will also be necessary to demonstrate how Districts intend to contribute towards the required 60% cut in CO² omissions by 2050 and how it is intended to identify and respond to the potential impacts of climate change in their area. The RSS requires that the region's environmental and natural resources will be protected and enhanced by a variety of measures and that growth and development will be planned for a managed positively to create and maintain sustainable communities.

Recommendation 1: The general thrust of this section is supported although some of the targets are going to be challenging to meet without more commitment on behalf of the Government to statutory standards for a sustainable construction.

7.0 Section Two – The Context for the Spatial Strategy

- 7.1 Reflecting the recent economic performance and quality of life available in the South West the population of the Region has grown by more than 400,000 since 1991, primarily as a result of immigration and growth has been accelerating since the early 1990s. Typically the South West gains in excess of 30,000 people from within the UK annually. This scale of immigration is expected to continue for the foreseeable future. Recent forecasts suggest that by 2026 the region's population could have grown by over 750,000 people over the 2006 base figure giving a regional population of 5.85 million.
- 7.2 One of the distinctive features of the region is its older than average population profile compared with other English regions. In 2001, over a million people in the South West were aged 60 and over, almost 24% of the population compared with 21% in England as a whole. By 2026 it is anticipated that this will have risen to 30%. The more elderly members of this age group are expected to increase even more rapidly so that by 2026 the number of south west residents aged 75+ will have increased by 40% over 750,000.
- 7.3 At the other end of the age spectrum the number of school aged children and young adults in the region will be almost static. Although the total population will rise by up to 20% the number of 5 to 19 year olds will rise by less than 2%.
- 7.4 The population growth expected will influence the demand for housing. High demand has inflated house prices and in most parts of the South West the gap between earnings and house prices is such that many households now cannot afford to own their own home. Around 10,000 households are registered as officially homeless and more than 120,000 are on current housing registers. The Barker Review of housing supply maintained that constraints on housing provision have been a major factor in creating high and rising house prices in the UK. The report argued that providing housing that most households can afford

will only be achieved through increasing the supply of new housing nationally. In the South West however, the attraction of much of the region to inward migrants means that increasing housing supply alone will not solve the problem of affordability and other measures to provide affordable homes to rent or buy should be supported.

- 7.5 Rising household numbers, the demand for affordable housing and the generally buoyant economy of the region suggests a need to increase and accelerate the provision of housing over the life time of the RSS to provide an adequate choice and mix of housing of all tenures, across the region, concentrated at the most sustainable locations. Technical forecasts indicate that the level of housing provision will need to be consistent with potential household and job growth i.e. at levels higher than those in the RPG10 and predict that around 25,000 new dwellings per year will be needed to meet the scale of need arising from improved economic prosperity, to respond to under-supply in the current market and to address the issues of affordable housing across the region.
- 7.6 However, the review of evidence leading to the 25,000 forecast is heavily dependent on the accuracy of two key underline assumptions:-
1. The first takes the view that the central forecast for economic growth is 2.8% per annum for the next two decades in spite of the evidence already seen that growth is slowing in the light of oil and resources prices.
 2. The second assumption, which accounts for a demand for 75,000 houses alone is that the rapid decrease in household size will continue unabated during the plan period and that no physical measures or other changes will take place to alter these trends.
- 7.7 The functional approach adopted by the Spatial Strategy is that the identification of settlements should avoid creating a hierarchy of cities and towns determined just on population size and should instead be based on selecting significant places because of their role and function. This is a distinctively different approach from that adopted in RPG10. The majority of the new development needs to be focussed at the strategically significant settlements, in a way that encourages a better balance between homes and jobs. Elsewhere, the policy approach for individual settlements and the level of appropriate development should reflect evidence relating to a given settlement's role and function, its significance locally and the sub-regional context. The nature of the region requires a "fine grain" approach if places are to develop as sustainable communities and as such, a single region-wide approach to development would not therefore be appropriate.

Recommendation 2: **The functional approach proposed by the RSS is a logical way forward. There is a need to understand how each of the individual settlements in an area works rather than simply referring to its population base as the basis for planning for the future of that settlement. This has clear implications however for villages in rural areas and how their future would be mapped out. [This is addressed again in a later section].**

The identification that the affordable housing issues in the South West are more complex than identified in the Barker Report is notable. Clearly a more complex solution is required on a major scale to overcome the disparity between income and ability to buy housing is called for. The use of exception type policies in relation to bigger settlements i.e. over 3,000 population, maybe appropriate for example.

Where growth is allocated matching investment in infrastructure must follow and this will be as applicable to settlements outside the principal urban areas.

8.0 Section Three – The Spatial Strategy & Guidance for the Scale & Location of Development

- 8.1 The RSS identifies that it is of particular importance, in terms of satisfying anticipated needs for housing, that the annual rate of provision increases from about 20,000 dwellings per annum to about 23,000 relatively quickly. Policies in this section recognise that accommodating this scale of change will have major implications for infrastructure investment, to support economic development and regeneration and to ensure that the communities affected by delivering high levels of housing provision will see improved community facilities delivered in a planned way. The future of development of the region is guided by the three linked policies, A, B & C which respectively deal with development at Strategically Significant Cities and Towns (SSTCs), in other towns which play an important functional role locally (which LDDs will need to identify) and in other smaller settlements and the countryside. Other policies set out guidelines for the implementation of this approach to development, placing emphasis on the quality of development and the necessity of linking infrastructure to development.

9.0 Development Policy A: Development at the Strategically Significant Cities & Towns

- 9.1 The primary focus for development in the South West will be those places which offer the greatest opportunity for employment, and the greatest levels of accessibility by means other than car to cultural, transport, health, education and other services. In our area this means Exeter which has been identified on the strategic emphasis map as being a settlement capable of realising potential. The RSS identifies that 66% of the total housing provision per annum will be at the 21 listed centres, which includes Exeter.

Recommendation 3:

Concentrating the majority of growth in housing and associated development on a limited number of settlements rather than a strategy based on more dispersed growth pattern is clearly the more sustainable approach to development distribution. East Devon sits within the “realised potential” zone which runs through the East of Devon, through Somerset, Dorset, up through Bristol and on to Cheltenham & Gloucester. The principal that where dormitory relationships exist between the SSCT and other towns and villages nearby is not exacerbated by development proposals contained within local development documents is also supported.

10.0 Development Policy B: Development at Market Towns

- 10.1 Where market towns meet the following criteria they will be judged suitable as focal points for the provision of locally significant development:-
1. Where there is an existing concentration of business and employment or there is a realistic potential for it.
 2. Where shopping and cultural, religious/faith, educational, health and public services can be provided to meet the needs of the town and its hinterland whilst minimising car dependence.
 3. Where there is potential to maintain and develop sustainable transport modes.
- 10.2 These towns are the places where locally significant scales of development should focus in the future with the bulk of district housing provision outside the SSCTs being made in them. Local Authorities should base their allocation of development in relation to these towns on a clear evidence based view of the changing role and functional settlements in their area for work and service delivery. This requires a sound understanding of how they function and the hierarchy relationships between small villages, between villages and market towns and between these communities and the SSCTs. In some Districts there may be few or no towns which meet all the criteria for Development Policy B and these cases the District should take account of the functional role of settlements beyond their boundaries as well as identifying those settlements with the potential to play a more strategic role locally and allocate development accordingly.

11.0 Development Policy C: Development in Small Towns & Villages

- 11.1 In small towns and villages not meeting all the criteria of Development Policy B, based on an analysis of roles and functions, development will be possible where it supports small scale economic activity which fits the scale of the settlement, extends the range of services available including out-reach delivery of services making use of existing premises where possible, does not significantly increase traffic in local roads and promotes self-containment.
- 11.2 The RSS suggests that evidence points to the fact that population growth and the delivery of more housing in villages may not solely be the solution to rural service decline and could result in increasing dependence on other centres, requiring access by car in the absence of viable transport alternatives in many rural areas. This is a difficult issue as there are many incidences of rural housing affordability problems, often coinciding with relatively low incomes. Targeted small scale development for housing in accessible village communities will be appropriate if it is supported by local needs surveys and other parish and village plans. In many cases the emphasis will be on the provision of affordable rather than market housing. Development in open countryside, particularly of housing will be strictly controlled.

Recommendation 4:

The identification that it is more important to focus development where services already exist rather than an attempt to put in housing in the hope of supporting failing services is an appropriate way forward. The idea that adding open market housing to villages will make them more sustainable is identified as misconceived as it is the service provision available in the market and smaller towns that is the valuable resource which should drive the future allocation for housing and other development.

There maybe some debate as to whether or not guidance should be provided at this level of policy development on the future of villages and hamlets not classified as Policy C settlements. However this is much more a matter for the LDD to address but should be based on the principal set out in the RSS of the function of the settlement both for its own inhabitants and for those of its hinterland. These days many villages functions wholly and solely as residential settlements with little or no facilities available. The future of any facilities that do exist has a less direct relationship with the number of houses in that community than with the type of service and quality of service provided.

12.0 Development Policy D: Infrastructure for Development

- 12.1 The intention of the RSS is that Local Authorities working with GOSW, the RDA and other significant Regional bodies such as the Strategic Health Authorities will co-operate across administrative boundaries to ensure that existing infrastructure is used most effectively and infrastructure required to support strategically significant development is secured.

13.0 Development Policy E: High Quality Design

- 13.1 This requires that all development in rural and urban settings delivers the highest possible standards of design in terms of urban form and sustainable criteria and will apply to all new, replacement and refurbished public buildings which should be designed to have multiple uses as far as possible.

14.0 Development Policy F: Master Planning

- 14.1 Developers, Local Authorities and public agencies should ensure that major development areas should be planned on a comprehensive and educated basis within an overall Master Plan of phasing regime. Working with partners to deliver a high quality of life, protect and maintain environmental assets avoiding areas susceptible to flooding, consideration to increasing densities to 50 dwellings per hectare for housing developments and sites close to public transport nodes.

15.0 Development Policy G: Sustainable Construction

- 15.1 The RSS is looking for development to meet construction levels at minimum building standards in the emerging “Code for Sustainable Homes” which the Government has recently consulted on but has yet to adopt. It requires that all new and refurbished buildings achieve the requirements of BREEAM and Eco-homes, very good standard; and that all larger scale development and urban extensions meet the top level 5 of the emerging ‘Code for Sustainable Homes’, including carbon neutrality.

16.0 Development Policy H: Re-using Land

- 16.1 Local Authorities are to ensure that the full potential of previously used land is taken into account in providing for new development while recognising that it may not be in the most sustainable locations nor that it may necessarily always be the most sustainable land use. For the region as a whole the aim is to achieve at least 50% of new development on previously developed land.

17.0 Development Policy I: Release, Redevelopment and Disposal of Land

- 17.1 This relates to land owned and operated by public bodies and development here should enshrine the principles of sustainable development and the sequential test.

Recommendation 5: All the principles enshrined in these policies are supported although the ability to deliver 50% of new development on Brownfield land is going to prove testing in East Devon with advent of the New Community on Greenfield land.

18.0 Section Four – Sub-regional Strategy Statements & Housing Distribution – Exeter Spatial Strategy

- 18.1 An important feature of this draft RSS is the way in which development in different parts of the region is to be guided in the future recognising that the region is not uniform and that differing pressures and opportunities will arise in different parts of the region. Therefore one approach to development is not necessarily aimed to fit all the circumstances. Nine detailed Sub-Regional studies took place which reported during 2005 and formed the basis of the “Strategic Authorities First Detailed Proposals”. In all cases, growth scenarios were tested to develop a strategy for the urban area, which applied the sequential approach of identifying capacity for development within the existing urban area and then seeking sustainable urban extensions if appropriate. Located centrally in the region Exeter with a population of 107,000 has good connectivity by the M5 and A30/A303 and by strategic rail links. It benefits from airport, a university, cultural and retail strengths and together with its setting has encouraged strong economic growth in the city over the past 20 years. This is set to continue but brings with it significant planning challenges of accommodating growth and change without undermining the quality of the city.
- 18.2 Current levels of job generation in the Exeter travel to work area (TTWA) are projected to continue in the period up to 2026 (22,300 – 28,500 jobs) offering the potential to increase the access to, and the dispersal of prosperity across a greater cross section of the community. Such high economic growth prospects will enable Exeter and the Region to realise its economic potential attracting investment in knowledge based industries and building on the potential of the University, Medical School and key employers such as the Metrological Office, the Airport and its associated strategic employment site and developing the skill base of the area. LDDs for Exeter and East Devon should make provision for the further development of the City as a centre for business and service sectors together with safe guarded strategic sites suitable for further investment in specialised, science and technological based industries. These forms of economic growth are thought to be generally compatible with the conservation of the areas high environmental quality.
- 18.3 It could be argued that the projection of economic growth and job creation are modest when compared with the most recent trends in job creation at Exeter. Since 1999 The City has seen the third highest percentage level of job creation in the Country. Employment land supply in

the City is failing to meet demand. There is an argument to say that the Spatial Strategy needs to accommodate a higher level of growth in employment to reflect Exeter's full potential and that the current trend represents the present and future trend for employment growth in the City. Currently provision is made in the Devon Structure Plan for some 30 hectares of land at Skypark and 25 hectares for a science parks somewhere in East Devon close to the M5. Some employment land provision will be required at Cranbrook as part of any expansion and some 20 hectares will be required probably as part of the urban extension in the Area of Search K post 2021. We are aware of the land supply issues that currently exist in the City and a case could be advanced for a further strategic employment site towards the end of the plan period.

Housing numbers within the Exeter Urban Area

- 18.4 The strategy for the Exeter area is to focus development within, and adjacent to, the urban area and to ensure that population and workforce growth is commensurate with economic activity and growth in jobs. Policy SR16 requires provision of 18,500 dwellings in the Exeter Urban Area over the next twenty years. This is to be provided as follows:
- An average of about 525 dwellings per annum in Exeter City
 - An average of about 325 dwellings per annum in East Devon (New Community)
 - This will result in the new community providing for 6,500 dwellings.
 - In order to cater for development requirements after 2021 a second strategic urban extension (or new community) should be identified providing for at least 1,500 dwellings on the eastern and southern sides of Exeter City in an Area of Search K.
- 18.5 In strategic policy terms the approach of directing growth of housing to the Urban area is the most sustainable approach and given the level of job creation expected in the Exeter area the overall level of housing growth for the Exeter area is justifiable. It has always been a requirement that the new community be capable of expanding beyond 2,900 dwellings; the Structure plan provides for up to 3,500 at the new community by 2016. However, whilst some modest work on future proofing the new community for further expansion has been done there has been no detailed assessment of the implications of accommodating up to 6,500 dwellings. Therefore it is appropriate to consider this question in considering the Council's response to the draft RSS.
- 18.6 Land Available for Expansion**
- 18.7 Land to the north of Cranbrook is bounded by the railway line and National Trust Land with inalienable rights and thus no expansion is considered likely to the north.
- 18.8 Land to the west: Station Road forms the western most boundary of potential future expansion land. Beyond Station Road is land approved for the Intermodal Rail Freight Facility. Former Parkland landscape forms the western boundary of the current master plan and this land would be unlikely to come forward for development. A total of some 30 hectares appears to be available for development as part of a future expansion westwards. This land is subject to noise impact from engine testing at night. The current location for engine testing would result in residential development having mechanical ventilation. Part of the land would be subject to an unacceptable impact but were the location of engine testing to move the whole of this land could be dealt with by mechanical ventilation
- 18.9 Land to the east of the master plan is subject to a number of constraints: Two overhead pylons are a visual detractor. Although technically it is assumed that the pylons could be put underground at a cost building near pylons will be sensitive. The nearer pylon towards the north east corner of the current master plan approximates with an alignment for part of the flood plain for Cranny Brook. The flood plain forks in a south east direction roughly aligning with the second overhead pylon. The land beyond the second pylon rises and the Knolls and landform provide a strong landscape constraint and physical separation and setting to Whimble. There is some 30-40 hectares of land to the east of the current master plan that is potentially available for expansion to the east.
- 18.10 Land to the south of Cranbrook is bounded by the former A30.

- 18.11 The central section of the former A30 to the east of Rockbeare sits above the 40m AOD contour. A major constraint is the 60m AOD contour which forms a strong landscape ridge to the south of the former A30 in a line roughly parallel with the road. Between the former A30 and the 60m AOD some may argue that low density sensitively handled development could be achieved without major landscape impacts. However, this land is a minimum of 1200 metres from the edge of the proposed Town Centre and brings the development closer to the line of the Airport runway. An expansion in this direction challenges the sustainability assumptions of the form of the current master plan. By way of an illustration, the distance from the central part of such an expansion area to the Skypark employment site would be 5km; this is the same distance between Exe Bridges to the Sowton industrial estate in Exeter.
- 18.12 The central section along the former A30 is bounded by land designated as Green Wedge in the East Devon Local Plan. This designation is designed to prevent coalescence with Rockbeare in accordance with Structure Plan Policy ST25: New Community Landscape Setting which states: “the appropriate District wide Local Plan should include policies to protect the setting of these new communities within the landscape, ensure that they retain a separate identity and do not coalesce with existing settlements”.
- 18.13 The western section of the former A30 is less constrained by landscaping and other designations. A strong landscape feature is the 40m AOD contour which forms a ridge between the new community and the Airport. The major constraint south of the former A30 in this location is the relationship to Exeter Airport and concerns about noise and a desire that the expansion of the New Community in this direction should not prejudice the operation. The land is subject to noise from engine testing during night time hours. The location of engine testing is closer than 900m from this land, the site being at the north western end of runway 13/31. Development of this land would be unacceptable whilst engine testing continues from this location. Were engine testing to move to a site closer to the current terminal the whole of the land would be subject to noise above 65dBA when engine testing occurs such that at a minimum mechanical ventilation would be required for all the dwellings. This area of some 50 hectares would be best used as a buffer development, namely as an expansion of Skypark.
- 18.14 In Conclusion, the land that is available for expansion of Cranbrook amounts to some 60-70 hectares to the north of the former A30.

18.15 Land Budget of Existing Masterplan

The current land budget for delivering 2,900 homes is as follows:-

DESCRIPTION OF DEVELOPMENT	HECTARES
Residential (Total net area)	78.2
Town Centre (mixed use on the development framework plan)	11.8
Local Centre (mixed use on the development framework plan)	0.6
Secondary and Primary School Campus (to include one shared MUGA and shared playing fields)	11.6
Primary School (no. 2) (to include one shared MUGA)	2.5
Country Park (to include trim trail and children’s play equipment)	32
Formal Sport Provision (to include facilities for Cricket, Tennis, Bowls, Football & Rugby and LEAPS)	8.6
Informal Open Space (to include LEAPS)	4.3
Strategic Existing Landscape (existing hedgerows and tree groups to be retained either in full or part)	10.6
Station (to include car park)	0.8
Strategic Infrastructure	14.8
TOTAL	176

The total net area of land identified for residential development is 78.2 hectares.

The proposed density of development is as follows:-

Density of Development	Net Hectares	Average Density (indicative)	Total Dwellings (indicative)
40 + dwellings per hectare (town centre areas)		50	120-200
40 + dwellings per hectare	6.5	45	280-330
30 – 40 dwellings per hectare	60.6	35	2075-2175
20 – 30 dwellings per hectare	11.0	25	250-300
TOTAL			2900

18.16 The average density for the whole settlement is 35 dwellings per hectare. Were the developers obliged to build to the top of each density range the average density for the whole of Cranbrook could be raised to 42 dwellings per hectare, i.e. 3,260 units in total on the same 78.2 hectares. [The average net density for London is 42 units per hectare.]

18.17 This assumption should be treated with some caution. Although developers often build out higher than the approved densities Cranbrook will be a completely new town that ought to have a variety of house type and house layouts, it should have the scope for areas of distinct character that include large detached properties as well as small apartments. Although there is a clear preference from the RSS for high density i.e. 50dph, this is an approach we do not necessarily accept as desirable in this location. Cranbrook is not a true urban extension; the settlement is not contiguous with the city. Although in policy terms it functions as an urban extension it is a free standing town whose character is intended to be reflective of East Devon Towns not a part of inner city Exeter, Bristol or any other large urban city. Building out at an average of 50 dph would be at odds with the current master plan and design principles.

18.18 Land Budget Required for 6,500 Units

18.19 To deliver 6,500 units the following land budget would be required in addition to that currently included in the master plan:

- Formal play areas at

22.2sqm per unit = 10.6ha

Given that 8.6ha is provided in the current master plan for 2,900 units only an additional 2ha is required.

- Play space at 17.8sqm per unit = 8.5ha

Given that 5.2ha is provided in the current master plan only an additional 3.3ha is required.

- A Primary School will be required at 2ha.

- An additional neighbourhood centre at 1ha .

- Additional employment land is required. Currently there is no single allocation within the master plan. Employment is taken together with the Town Centre provision. Whilst this is acceptable for 2,908 dwellings a town of 6,550 units will support a population of 14,410 people and comparison with other towns of this size suggest, that an employment allocation is required. By way of comparison The Heathpark Industrial Estate at Honiton occupies an area of 24.5 hectares (Honiton has a population of 11,213). The proximity to Skypark and proposed Science Park will have an impact on the amount of land that needs to be provided at Cranbrook but even so a minimum provision of 13 hectares (net) of employment land is suggested. 13 hectares (net) could produce 1,500 jobs, clearly there are many variables: density of development, type of land use, mix of use and job density figures. The report "Market facing Assessment of the Demand for and supply of Employment Land, and an Assessment of the supply of Employment Land from Non-Industrial Sources" by King Sturge for the South West Regional Assembly recognises the importance of employment development in the new community. It states, on page 31 "In both Plymouth and Exeter the role of the planned

new communities in accommodating employment development will be a critical consideration for developing sustainable communities”.

- 18.20 The maximum amount of land required for 6,550 dwellings (assuming a density of 35 dwellings per hectare) is as follows: An additional 3,600 dwellings are required, at an average density of 35dph produces a requirement of 102.8 hectares plus 28 hectares for other uses giving a total of 130 hectares.
- 18.21 The absolute minimum amount of land required for 6,500 would be to assume 3,260 can be delivered on existing masterplan, 3,240 units at 50dph = 65 hectares plus 28 hectares for other uses gaining a total of 93 hectares.

18.22 Level of Development that can be accommodated on 70 hectares

- 18.23 The land available for expansion of the new community amounts to some 70 hectares. This is sufficient to accommodate a minimum of 4,760 dwellings at 35 units per hectare (assumes formal play areas and play space reduced to 2ha and 3.3ha and that 3,260 can be achieved on current master plan), or a maximum of 5,550 dwellings at 50 units per hectare.
- 18.24 Assuming that 3,260 dwellings can be achieved on the current master plan for 2,900 dwellings, and assuming an additional 2,290 dwellings delivered at 50 dwellings per hectare 5,550 units would require the following land budget:

- 3.7ha of formal play areas
- 4.6ha of play space
- 2ha Primary School
- 1ha neighbourhood centre
- 13ha employment (sub-total 24.3)
- 2,290 at 50 per hectare = 45.8ha.

Total land budget of 70 hectares.

18.25 Conclusions

- 18.26 The land that is potentially available for expansion to the north of the former A30 is 60 -70 hectares. This could support between 4,760 dwellings and 5,550 dwellings dependent on some key assumptions, particularly density. Given the absence of any detailed study of the strategic drainage, landscaping and various other technical requirements which may impact on the gross and net land budget, it would be unwise to assume the maximum figure can be achieved.
- 18.27 To achieve 6,500 dwellings some 90 – 130 hectares of land would be required and Cranbrook would have to extend south between the former A30 and the Airport terminal, or to the east of Rockbeare or build within the green space to coalesce with Rockbeare. All options question fundamental objectives set out in the Local Plan and Structure Plan and challenge the sustainability and design principles of the original master plan.
- 18.28 The Linear form of the master plan which is sound for a town of up to 5,000 units becomes less sustainable as it expands; distances from the outer edges of the settlement would be remote from the Town Centre and thus residents are more likely to use the car for journeys to school, shops and work. Therefore, a fundamental question is posed when considering more than 5,000 units, namely, should expansion be delivered in a way more typical of a compact settlement rather than lengthening the settlement. A compact settlement would require housing development south of the town centre and allow improved pedestrian access to the amenities in the town centre. However, this would cause coalescence with Rockbeare. Such a response would be contrary to East Devon Local Plan Proposal AEA1 (New Community) and Policy EN4 which seeks to prevent coalescence and provide a Green Wedge around Rockbeare. Given that the Council is only now seeking the adoption of the Local Plan it would be completely indefensible to push for an option that is at odds with this policy.
- 18.29 The other option of meeting the additional units above 5,000 would be to provide housing south of the former A30 east of Skypark and north of the airport. Although there may be a

technical argument to be tested regarding noise level emanating from the Airport, we know this land is subject to noise from engine testing which produces noise levels in excess of 65dBA. Future residents with expectations of residential amenity may well complain about noise from engine testing and the operation of the airport. If some form of development had to be permitted in this area, an employment buffer between the airport and housing would be preferable. The airport is considered an important plank of the sub-regional economy; Policy TR9 Airports of the Draft RSS recognises Exeter as one of the three major existing regional airports which should meet an increasing proportion of regional demand for air travel. Building housing so close to an expanding airport is a recipe for future strife. This would be most unwise given the potential impact future housing may have on the operation of the airport.

18.30 Given that we are seeking to deliver a new town and many of the assumptions regarding employment levels, social and community infrastructure are still to be proven, indeed will not be proven for many years, it would be unhelpful to establish a level of provision at the new community that will be very challenging to deliver at best, but at worse could undermine public confidence in the planning process. It would be preferable to establish an upper target that is challenging but that we have some confidence could be delivered, with an opportunity to review progress and potentially revise targets at a later date. Clearly, if the new community is delivered successfully as a model for sustainable living, at high densities and to high standards of design, expansion beyond 5,000 units may be seen as the preferred solution for accommodating additional growth. Although the new community has still to be delivered we have learned a lot of lessons about building sustainable communities. We are trying to make this new community work, before the first house has been built the expansion plans are challenging the master plan, the form of the settlement, density assumptions and the objectives behind the local plan policy. It would be preferable to fix the final size of the new community when we have done a lot more work in understanding the implications of handling larger numbers.

18.31 Were the new community to be allocated a total of 5,000 dwellings, the remaining 1,500 that need to be accommodated in the Exeter Urban Area should be added to the 1,500 dwellings identified for the Area of Search K as part of the subsequent review of the RSS. It may be that the additional 1,500 dwellings giving a total of 3,000 dwellings would make for a more sustainable urban extension of Exeter than the planned 1,500 dwellings.

Recommendation 6:

- 1. That the Council support the strategy for the Exeter area that recognises the role of Exeter as a key economic driver of the region's economy and in turn the employment land provision that is required to support this future role. In view of the more recent successful performance of the Exeter economy a mid term review of job creation in the Exeter TTWA should be undertaken to establish whether it may be necessary to identify a further strategic employment allocation.**
- 2. That the overall growth assumption of 18,500 dwellings for the Exeter Urban Area be supported.**
- 3. That the RSS establish a requirement for a mid term review of housing numbers in the Exeter Urban area taking into account the result of a mid term review of economic growth.**
- 4. That the Council object to the provision of 6,500 dwellings at Cranbrook on the grounds that such an expansion can only be achieved by expanding south of the former A30 undermining structure and local plan policies designed to prevent coalescence between settlements, namely Rockbeare and the new community, and threaten the successful operation and expansion of Exeter Airport by potentially building dwellings in proximity to the airport where future residents could be expected to object to existing and future operations associated with the running of an airport including engine testing.**

5. That the principle of expanding the new community to accommodate a significant level of housing growth be supported and that an upper figure of 5,000 dwellings be provided at the new community to the north of the former A30 up to 2021.
6. That the new community be acknowledged as the first priority for accommodating housing growth in the Exeter Urban Area within East Devon beyond 2021 but in the absence of detailed assessments of how such expansion can be handled without harming interests of acknowledged importance the additional 1,500 dwellings identified for the new community be added to the total of 1,500 dwellings required for the Area of Search K to be brought forward in a subsequent review of the RSS.

18.31 Housing Distribution and Housing Totals for East Devon

18.32 Table 4.1 Housing Market Areas, Unitary Authorities and Districts: Housing Total and phasing produces an overall housing requirement for the District of East Devon of 11,400 dwellings over the next 20 years with an additional 1,500 dwellings that may be in Exeter City/ Teignbridge and/or East Devon. Of the 11,400 dwellings 6,500 are identified at the New Community. Therefore 4,900 dwellings are to be provided in the rest of East Devon over the next 20 years. This is equivalent of 245 dwellings per year. Currently the District builds about 500 dwellings per year in the District (development has not begun on the New Community). This reduction in housing numbers for the rest of the District outside of the Exeter Urban Area accords with the policy direction of steering growth to the SSTC. The benefit of this approach is that members will not be under pressure to allocate housing to settlements where there is clearly not a will to expand. However, where there is less opportunities to allocate large sites at the towns within the District it follows the number of affordable houses provided will also reduce. It also raises the prospect that environmental lobby groups will wish to argue that because of the number of windfall sites that come forward in East Devon there is little demand to allocate any new residential sites in East Devon.

Recommendation 7: That members note the implications for housing numbers and distribution for East Devon outside of the Exeter Urban Area and support the figures included in Table 4.1.

18.33 Towns within the Exeter Area of Influence

18.34 Exeter's economy continues to be a dominant influence over a number of towns within the wider sub-region, with substantial levels of inward commuting from towns such as Exmouth, Crediton, Dawlish, Tiverton, Honiton and Ottery St Mary. In these towns there has been a considerable scale of housing development over the last 20 years but this has not been matched by local job creation. There are therefore strong and complex functional relationships between the number of towns in the sub-region and the city itself. The Strategy does not seek to increase relative inward commuting levels but local needs should be catered for through LDDs to maintain the viability of these centres under development policies B & C (see above) with opportunities for job growth promoted through appropriate allocations of land and other measures. Provision for additional housing at these towns should be on a scale consistent with economic growth and at locations most accessible to existing and future employment and other services and facilities.

Recommendation 8: The proposal that there is a need to secure improved self containment in the towns within the wider sub-region is welcomed and particularly the provision of employment land and the creation of jobs to reduce car-bourne commuting. However the delivery of employment land in these areas may well prove problematic and highly contentious and may also be dependent upon infrastructure support particularly transport infrastructure. Public transport enhancements to those Towns within the Exeter Area of Influence should be prioritised.

Policy SR18 requires that the LDDs of the authorities around Exeter should facilitate culture, tourism and retail developments and enhancements for Exeter although how and why this should be done is unclear. The greater objective is to create self containment for the surrounding towns and villages under the sustainability theme.

19.0 Section Five – Regional Approach to Transport

19.1 The RSS points out that transport is not just a key component of delivering the new Spatial Strategy but planning development carefully can have a noticeable effect on movement in the region, particularly by car and in turn help to reduce the rate of increase in green house gas omissions. Actually reducing the need to travel in the South West is a significant challenge given the geography of the region, its rural nature and the predicated growth in both population and the economy. However congestion and unreliable journey times can prejudice success of the regional economy whilst the growth in private transport and the reduction in public transport can leave some section of the population marginalised. Appropriate transport investment is therefore required across the region to deliver the regional employment strategy. There is also a fear that improvements to the strategic road routes such as the M4/M5 and the A303/A358 may increase traffic flows while not bringing the economic benefits wished for. The findings of the strategic sustainability appraisal (SSA) implies that a sustainable approach to transport alone will not be sufficient to make an difference to regional CO2 omissions and congestion unless parallel measures are taken in the strategy to complement these. The management of travel and transport to serve regions people and economy will require selective improvements to the road and rail networks with a focus on improving the reliability and resilience of connections.

19.2 Local authorities working collectively and with transport providers and stakeholders will need to consider how the following measures can be implemented to improve the network management:

- Action to minimise the use of the motorway network and main longer distance routes by local commuter traffic at peak times
- Improved park and share facilities (linked to other solutions)
- New network management measures to manage the demand for road space including consideration of congestion charging

Specifically proposed are the development of the heavy rail network including at Exeter to provide for local and commuter journeys and to deliver spatial growth and congestion targets. Business cases will need to be developed in conjunction with the rail industry to achieve peak frequency requirements and improved passenger accessibility and quality of facilities. Also there should be improved access to and investment in the regions airports including Exeter to meet more of the regions air travel needs from within the South West.

19.3 To help achieve a stepped change in modal shift all new development will need to be designed and modelled using best practice methods to optimise high quality public transport accessibility both within and from/to developments. Every local transport authority will be set challenging public transport usage and accessibility targets and ensure that monitoring and enforcement actions are implemented. A regional “Design for the Bus Practice Guide” will be prepared and maintained to highlight and encourage best practice and regional bench marking.

19.4 The M4/M5 are to be managed both the demand for travel on them and to maintain the reliability of journey times. Policy TR3 proposes a second strategic route in to the region from London to dual carriageway standard utilising the A303/A358 in order to improve the resilience of the inter-regional network and to maintain the competitiveness of the South West.

19.5 Airports within the region should meet an increasing proportion of regional demand for air travel to reduce leakage to other regions and the London airports with the expected growth met by developing the major existing airports in the region including Exeter. Local authorities, airport operators and other agencies will provide improvements to aviation facilities and

access to airports (including public transport) in the region to meet the future development requirements consistent with the overall transport strategies for the urban areas.

- 19.6 The rail network in the region is currently unable to handle the largest “standard” containers (9ft 6”) on conventional rail wagons. The rail industry Gauging Policy does not identify the South West region for gauge enhancement based on loadings and the likely business case for investment. Whilst accepting this position in the short medium term there is concern about the impact of gauge limitations on the future competitiveness of the region. Where demand arises, containers could be transported using specialist rail wagons as will be the case from the East Devon rail freight interchange facility near Cranbrook which currently has a resolution to approve subject to the signing of a Section 106 Agreement.

Recommendation 9: Support the regional approach to transport on the basis that the key infrastructure requirements set out in the Exeter sub-regional strategy statement are taken forward.

20.0 Section Six – Harnessing the benefits of population growth and managing the implications of population change

- 20.1 The key areas this section deals with are affordable housing, housing densities, gypsy needs, provision of community services, planning for health care, facilitating access to skills training and protecting and enhancing local cultural facilities.
- 20.2 Policy H1 on affordable housing requires that within the 23,060 dwellings per annum required for the region, at least 7500 affordable homes per annum should be provided in the period 2026. Provision should be made for at least 30% of all housing development annually across each Local Authority Area and Housing Market Area to be affordable, with authorities specifying rates up to 60% or higher in areas of greatest need.

Recommendation 10: This policy is supported but it needs to go further in looking at the wider delivery of affordable homes by alternative providers to RSL’s and to consider the delivery of exceptions sites for settlements of over 3,000 houses. The RSL has identified that simply building higher levels of market housing actually attracts more commuters, second homes owners or retired people from outside the region. The need for more creative solutions is identified but not expanded upon. This is a notable omission. The RSS could be much more creative in this field.

- 20.3 Housing densities are required to exceed 30 dwellings per hectare in all parts of the regions with averages across housing markets area to be in excess of 40DPH over the plan period. The density of housing at the SSCTs should be at least 50DPH and considerably higher in well planned and mixed use developments within the existing urban area. Planned urban extensions of SSCTs and adjacent new communities should achieve 50DPH or more overall.
- 20.4 The reasoning behind this policy is sound; higher densities in urban areas produce more sustainable forms of living supporting public transport and non-residential uses such as shops. In the hands of skilled architects and urban designers high density can produce wonderful urban areas. Good design combined with mixed uses such as cafes, restaurants, and shops produce good urban living. There are many examples in the region of high density redevelopments that have been successful, the centre of Bristol and Exeter are such examples. However building at these densities in the outer areas of Bristol and Exeter produce very different outcomes. High densities without mixed uses can produce oppressive residential blocks without the vitality associated with City Centres. Small gardens with very little amenity spaces lacking parking facilities for cars can produce residential estates that are disliked. Cities typically display a variety of character, pleasant leafy neighbourhoods with semi-detached houses, large detached dwellings and terraces all combine to produce a city with distinct neighbourhoods and character.

- 20.5 The Regional Spatial Strategy should be setting the challenge of producing real urban living which works best at higher densities but allows the Local areas to inform density numbers based on character appraisals and the needs of the whole settlement. We must avoid moving from one extreme where all that was built was low density suburban estates to another extreme of only high density developments. The policy should be worded as per Development Policy F this states consideration should be given to increasing dwelling density to in excess of 50dph. Whereas the current wording of the policy would make it a requirement that all new housing in Exeter and the New Community would have to achieve 50dph, this is objectionable and will produce a backlash in years to come unless the volume house builders undergo a major change that see them employ architects to design tailored solutions to every site and become builders of communities as compared to their current role of building houses. It is only when they begin to deliver community and commercial infrastructure as an integral element of their house building will we be able to guarantee successful mixed use development at high densities. Until this is achieved, and there must be some doubt that this will ever be achieved, we will have vibrant city centre built at high densities with mono use residential suburbs also built at high densities but without the space and landscaping that made such neighbourhoods attractive in the past.

Recommendation 11: **Whilst recognising the reasoning behind raising densities in Urban Areas the figure of 50dph will not be appropriate in every urban area. The character of the Cities and Towns designated as SSCT varies considerably. Minimum densities should be determined by individual LDD informed by character appraisals that allows local circumstances to inform urban form and density. The wording of the policy should reflect Development Policy F “within urban areas or urban extensions.....consideration should be given to increasing dwelling density to in excess of 50dph.” Prescribing a density figure is ill conceived and could lead to public dissatisfaction with the character of developments.**

- 20.6 Policy TG1 requires that Local Authorities should work together to carry out detailed assessments of needs for gypsy and travel accommodation requirements and that local authorities working with partners should provide for about 1,100 additional pitches for gypsy's and travellers in the plan period in the region by identifying need for residential pitches, park homes and transit pitches and green infrastructure for inclusions in their plans identifying realistically deliverable sites.

- 20.7 This approach is acknowledged as the appropriate way forward and this District is already involved in the county wide assessment of gypsy and traveller need which should be reporting in October. The delivery of sites particularly realistically deliverable sites is going to be subject of much controversy but must be addressed within the next 12 months.

Recommendation 12: **That Policy TG1 be supported.**

- 20.8 Policy GI1 states that development of Networks Green Infrastructure (GI) will be required to enhance the quality of life in the region and support the successful accommodation of change. GI networks will comprise multi functional, accessible, connected assets planned around existing environmental characteristics.

Recommendation 13: **This District is already commissioning with its partners a Green Infrastructure Assessment of the area East of Exeter to inform the future planning of the area so that development works around the environment rather than imposing itself upon it. Consequently this policy is strongly supported.**

21.0 Section Seven – Enhancing Distinctive Environments And Cultural Life

- 21.1 This section of the draft RSS sets out the regions approach on two critical aspects of the quality of life in the region: culture and the environment. Two particular policies are of relevance, ENV2 Landscape Character Areas and F1 Flood Risk.

- 21.2 ENV2 Landscape Character Areas policy requires local planning authorities to undertake assessments of landscape character at a strategic level and in partnership with an adjoining authority where necessary in order to identify priority areas for the maintenance, enhancement and/or restoration of the character and to provide an appropriate policy framework in LDDs for each area.
- 21.3 This strategic approach is considered the right one when undertaking character assessments and the identification of priorities for maintenance enhancement and restoration. It is anticipated that this approach will provide security and protection for those areas identifying characteristics of a particular character and high quality examples of that character

Recommendation 14: That Policy ENV2 be supported.

- 21.4 Policy F1 Flood Risk identifies that the priority is to defend existing properties and where possible locate new development in places with little or no risk of flooding. To protect floodplains and land liable to tidal and coastal flooding from development and to follow a sequential approach to development in flood risk areas. To relocate existing development from areas of the coast at risk which cannot be realistically defended and to identify areas of opportunity from managed realignment to reduce the risk of flooding and create new wildlife areas.
- 21.5 There are clear implications from this policy particularly regarding the possibility of relocating existing development from coastal areas at risk which cannot be realistically defended. The cost of defending the coast line is prohibitive and there are some important decisions to be taken about existing development that will be severely at risk in the not to distant future. By and large there has been a policy of no action in terms of coastal protection particularly if the cliffs where English Nature favour non-interference with the natural regression process. This will have implications for the seaside towns of the district in the long term. Equally areas that flood through the action of rivers need careful safeguarding and the implications for the re-development of Brownfield land in these areas is a conundrum which the RSS does not address. There are situations where the development in these areas can improve the existing flood pattern and local authorities will need to work closely with the Environment Agency to identify these. Overall the policy is supported.

Recommendation 15: That Policy F1 be supported.

- 21.6 This section goes on to deal with energy and renewable heat targets building upon the principles established in the first section. It also deals with the handling of waste and sets a waste hierarchy through policy W2. For SSCTs and other named settlements the location of new waste management or disposal facilities should be the subject of sequential approach. For rural areas and smaller towns there should be the provision of a network of local waste management facilities concentrated at or close to centres of population and an accessible network of strategic waste facilities.
- 21.7 These policies are supported both for waste handling and for the controlling, reusing and recycling of waste development. The need under Policy W4 for all proposals for larger scale development to include as part of the planning application a report comprising an audit of waste materials on the site is a new departure but one that is relevant to an approach which requires development to be capable of handling all its consequences.

Recommendation 16: That the policies on provision of waste sites and provision of waste facilities and waste hierarchy be supported.

22.0 Section Eight – Enhancing Economic Prosperity and Quality of Employment Opportunity

- 22.1 The draft RSS requires local authorities to undertake employment needs assessments, to identify employment sites and review them on a three year rolling basis and to allow the redevelopment of existing employment sites which no longer meet the needs of business or are poorly located for what ever reason. This should be on a sequential approach using the following sequence:

For Non B Use Class employment generating uses;
For mixed Use development including residential use taking account of the potential for higher employment densities;
For residential use only.

- 22.2 Policy E2 which is the identification of employment sites policy is precise. The provision of employment land in settlements outside the SSCTs is constrained and does not allow a sufficiently wide ranging approach to employment land provision to adequately meet the needs of the other towns. In this case there would appear to be far too much focus on the SSCTs for the delivery of employment land whereas the objective of creating sustainable communities demands that employment provision is made for all reasonable sized settlements.

Recommendation 17: The requirement to assess the supply of and demand for, employment in the District is supported including co-operation with adjacent local authorities.

- 22.3 The tourism policies requires that tourism be sustainable, that tourist destinations be safeguarded and invested in and under policy T03 that there is the identification of major new high quality, high profile attractions which should be located within or close to SSCTs and particularly within named major resorts none of which are in East Devon.

Recommendation 18: That the principle of directing major tourism attractions to the Strategically Significant Cities and Towns in policy T03 is supported.

23.0 Section Nine – Addressing Deprivation and Disadvantage to Introduce Intra-Regional Inner Qualities and Section Ten – Ensuring People are Treated Fairly and can Participate In Society

- 23.1 The draft RSS contains a statement of priorities for addressing deprivation and disadvantage in the South West and contains policies on equality impact assessment and taking account of the needs of all groups in society.

24.0 Implementation Plan

- 24.1 The Implementation Plan is one of the five draft RSS supporting documents. It sets out how the individual policies are to be actioned, by whom and when. SR15 – SR18 deal with development in the Exeter Sub-region and the implementation plan is identifying the detailed elements that are required to deliver the objectives. However the funding sources required is noted as yet to be confirmed. The document also includes an extract from the regional funding allocation submission detailing the regions priorities for transport investment. This deals with the trunk roads in the Exeter area, the inter-regional collectively associated with the M4/M5 and the A303 and to the development of the regional infrastructure fund (RIF) with additional contributions from the economic development block of funding which will provide an additional source of funds over that identified in the regional funding allocation (RSA) this is necessary to unlock the issue of the Junction 29 upgrade to release capacity for housing above 2200 units at Cranbrook together with assisting with other infrastructure requirements.

25.0 Conclusions

- 25.1 The consultation exercise currently taken place which ends at 5pm on Wednesday 30th August 2006 by which all duly made representations have to be submitted is part of the statutory process leading to the final adoption of the RSS. This exercise is the main opportunity for this Council to make its views known on the final content of the document. They help to provide an improved regional policy framework from which this Council will draw down the objectives for its own LDF.
- 25.2 Much of what is in the RSS is supported but raises challenges for delivery that are dependent on funding sources from outside the scope of the Local Authority and for raising the bar in respect of future development both housing and economic together with associated, social and physical infrastructure.

Legal Implications

No legal observations at this stage.

Financial Implications

There are no financial implications.

Consultation on Reports to the Executive

N/A

Background Papers

- Regional Spatial Strategy Document

Kate Little - Head of Planning & Countryside Services

Executive Board – 16 August 2006

Karime Hassan – Corporate Director Environment