

East Devon Local Plan 2020-2042

Site Selection Methodology

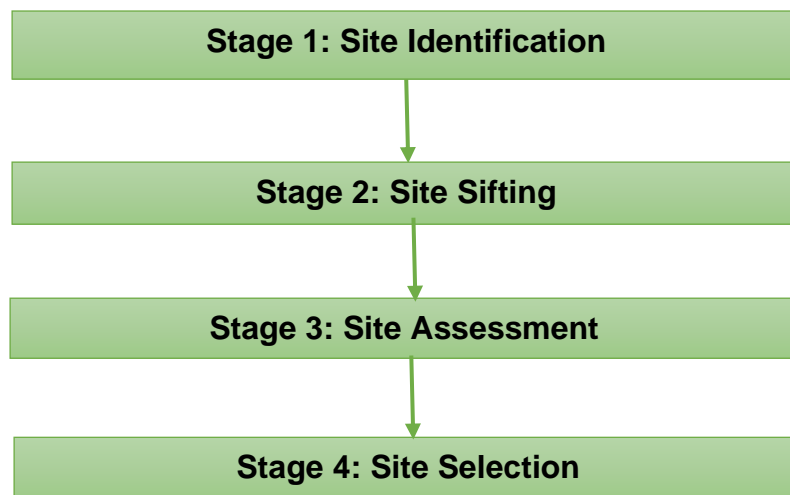


(v2 2024; amended following Consultation Draft Local Plan consultation, November 2022)

Introduction

- 1.1 East Devon District Council is preparing a Local Plan covering the period 2020 to 2042 that will allocate sites for development. This site selection methodology explains the process of how sites are identified, assessed, and selected for allocation, or not. The process will apply to housing, gypsy and traveller, and employment allocations. It may also be used for allocating other uses (for example open/play space) as necessary.
- 1.2 A 'Site Selection' report will contain the assessment of sites and identify those which are preferred to allocate, alongside those that are recommended to not be allocated, with reasons why. The report will explain how we have chosen to allocate sites that meet the Local Plan strategy for the distribution of development. It will collate evidence from numerous other sources in assessing whether to allocate sites or not.¹
- 1.3 It is important to note that, to be considered as 'sound', the Local Plan will need to be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.²
- 1.4 The process for site selection is shown in the diagram below, followed by an explanation of each stage.

Figure 1: Site selection process



Stage 1: Site Identification

- 1.5 There are several sources of sites with the potential to be allocated in the Local Plan. The following sources will be considered for the site selection process:

¹ Following the approach advocated by the Planning Advisory Service – see Topic 5 – Site Selection Process: [Future Proofing the Plan Making Process | Local Government Association](#)

² National Planning Policy Framework (NPPF), December 2023, paragraph 35b [\[ARCHIVED CONTENT\] \(nationalarchives.gov.uk\)](#) Note, the transitional arrangements mean that the Local Plan will be examined against the NPPF published in December 2023.

- Housing and Employment Land Availability Assessment (HELAA)
- Urban Capacity Study (2021)³
- Brownfield land register⁴
- Local Plan 2013-2031 allocations where a planning application has not been submitted⁵
- Local Plan 2020-2042 consultation responses

1.6 There will be some overlap within these site sources, with the HELAA likely to include sites from the Urban Capacity Study, Brownfield land register, Local Plan allocations, and consultation responses. Nevertheless, incorporating all of these sources should ensure that all sites where development may be possible are identified for potential inclusion in the East Devon Local Plan 2020-2042.

Stage 2: Site Sifting

1.7 Following the 'long list' of sites identified in Stage 1, a 'sifting' process will be carried out to ensure that only 'reasonable alternatives' are considered further (see figure 2). Only sites which meet criteria a), b) and c) are carried forward to Stage 3. In exceptional circumstances, sites may continue to Stage 3 even if they fail to meet the sifting criteria – such cases will be clearly justified. This could include potential gypsy and traveller site allocations, which are often located in the countryside. Similarly, some sites may pass the site sifting criteria but may not be considered a 'reasonable alternative' for other reasons and therefore should not be assessed at Stage 3 – again, this will need to be clearly justified on a site-specific basis.⁶

Figure 2: Site sifting criteria

| Requirements to pass sifting | Reason |
|---|--|
| a) Site is assessed as 'suitable, available and achievable' in the HELAA ⁷ | To ensure only sites of a sufficient size, ⁸ in an appropriate location, and without significant constraints are considered for potential allocation. |
| b) Site is located: <ul style="list-style-type: none"> ○ within, or adjacent to, settlements in Tiers 1-4 of the | To reflect the settlement strategy in the East Devon Local Plan 2020-2042. |

³ Available at: [300321bpurbancapacitystudyappendix1assessments.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/300321bpurbancapacitystudyappendix1assessments.pdf)

⁴ Published December 2020: [2020eddcbrownfieldlandregister.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/2020eddcbrownfieldlandregister.pdf) Nb. All of 2020 BLR sites are included in the Urban Capacity Study 2021, but future versions of the BLR may identify additional sites.

⁵ Consistent with NPPF paragraph 122.

⁶ For example, although car parks submitted by East Devon District Council are suitable, available, achievable in the HELAA, further work is required to assess need for car park spaces so there is current uncertainty on their deliverability.

⁷ There may be circumstances where the HELAA has not considered sites e.g. new sites submitted through Local Plan consultation. In these cases, EDDC Officers will make an initial judgement as to whether the site is suitable, available and achievable, to ensure sites to be considered even if they have not been assessed through the HELAA.

⁸ The HELAA site size thresholds are housing sites that can deliver at least five dwellings (gross) or 0.15 hectares in size; and employment sites of at least 0.25 hectares or 500 sq m of floor space.

| | |
|--|---|
| <p>settlement hierarchy (excluding Cranbrook⁹); or</p> <ul style="list-style-type: none"> ○ adjoining another site that is adjacent to a settlement in Tiers 1-4, and is also well related to that settlement; or ○ as a freestanding large-scale, sustainable new settlement, or able to be part of a new settlement¹⁰; or ○ adjacent to Exeter or other development in the West End; or ○ adjacent to an existing business park (if site is proposed for employment use) | |
| <p>c) Site is not already allocated in a 'made' Neighbourhood Plan</p> | <p>It would cause confusion and serve little purpose to allocate sites in the Local Plan which have already been allocated in a 'made' Neighbourhood Plan.</p> |
| <p>d) Sites in criteria a) or b) that already have planning permission will be noted but not assessed at Stage 3, unless the owner/site promoter submits the site for a different use that is justified, or the site is no longer deliverable</p> | <p>The Local Plan will not allocate sites that already have planning permission, as they are assumed to be deliverable and will form part of the figure for housing/employment commitments. There may be sites where planning permission has lapsed or likely to lapse that would justify site assessment, but these will be justified on a case-by-case basis. Some sites with permission may no longer be considered deliverable – again, assessment of such sites will need to be justified on a case-by-case basis.</p> |

1.8 There will be cases where the same sites crop up from the different sources at Stage 1, and even within the same source – for example, the HELAA has overlapping sites arising from several 'call for sites' submissions. Stage 2 should note sites that overlap completely (i.e. 100% overlap) – these sites will not go forward to Stage 3 to avoid assessing the same site twice. For partially overlapping sites that pass Stage 2, the separate parts of each site will be assessed at Stage 3.

Stage 3: Site Assessment

1.9 At Stage 3, a Site Assessment will be undertaken for all sites that make it through the 'sifting' stage. The assessment will contain some identifying details relating to the site (address, size, proposed use etc.) and then an evaluation against key planning issues, described in the following text.

⁹ New residential and employment development at Cranbrook is outside the scope of the East Devon Local Plan 2020-2042 as it is addressed in The Cranbrook Plan (adopted October 2022). Therefore, sites within or adjoining the Cranbrook Plan area will not pass site sifting.

¹⁰ Small sites located in 'areas of search' for a new settlement will be taken forward to Stage 3 even if, in isolation, they are not assessed as suitable, available, achievable in the HELAA, where they are able to contribute to larger sites that, together, deliver a new settlement.

1.10 External consultants have been appointed to consider and assess options for a new settlement. As such, several specific studies have been prepared – although these do not follow the exact same format set out below, all of the key planning issues are covered and taken into account when considering which new settlement site option to select at Stage 4.

Infrastructure

1.11 This section will highlight any known infrastructure issues that may arise from developing the site. This will reflect HELAA comments on education and highways made by Devon County Council for each site, and any responses by infrastructure providers raised in consultation on the Local Plan. Other known infrastructure requirements will also be identified where relevant, such as those relating to flood risk, sport and recreation, community facilities, healthcare, and utilities (including overhead power lines, and whether any HSE major hazard pipeline zones affect the site).

Landscape

1.12 The rural nature of East Devon means that landscape impact is often a key factor when selecting sites for development, so the Landscape Sensitivity Assessment (LSA) will provide further detail on this issue for each site. Landscape sensitivity is determined by combining landscape susceptibility with landscape value, resulting in one of the following sensitivity ratings for each site:

- Low
- Medium-low
- Medium
- High-medium
- High

1.13 Some sites may have a mixture of sensitivity ratings, for example larger sites or those with a varied landscape. Sites within existing urban areas will apply the same methodology, although the findings are likely to be simpler and less sensitive.

Historic environment

1.14 A summary of the impacts upon heritage assets will identify the heritage assets that could be affected by developing the site (Step 1 in Historic England guidance¹¹). This will conclude by assessing the impact of allocating the site on the historic environment as either:

- High: significant effect predicted. Mitigation unlikely to be possible. An impact that would compromise the asset(s) cultural heritage value to the extent that the attributes that led to its designation, or ability to understand or appreciate its value, are diminished and compromised. This would involve a loss of significance that could not be resolved through mitigation.
- Medium: no significant effects which cannot be mitigated. An impact is predicted but would not compromise the asset(s) cultural heritage value to the extent that the attributes that led to its designation, or ability to understand or appreciate its value, are diminished or compromised. Mitigation may make the impact acceptable. The overall significance of the asset would not therefore be materially changed.

¹¹ [The Historic Environment and Site Allocations in Local Plans \(historicengland.org.uk\)](https://www.historicengland.org.uk)

- Low: no concerns identified on current evidence, although archaeological mitigation measures may be required. No impact upon an asset is predicted or, if an impact is predicted, the cultural heritage value of the asset(s) would be unaffected.

1.15 As explained in Stage 4 below, a more detailed Historic Environment Site Assessment (HESA) will be undertaken for sites that are being chosen to allocate. This is a proportionate approach to ensure the impact upon heritage assets is considered in more detail for site allocations, that reflects the consultation response from Historic England on the Draft Local Plan, published November 2022.

Ecology

1.16 An ecological assessment of each site will be carried out. A desk study based system will assess the impacts of potential development sites on known designated sites and other habitats and features of nature conservation importance.¹² The desk study results are then validated by a site visit, which also seeks to identify any features of ecological interest that may have been missed throughout the desk study exercise.

1.17 For each site, a likely scale of adverse impact will be identified – either:

- “Minor adverse effect predicted (not significant)” – No known ecological reasons not to allocate the site. Minor adverse effects are likely to be mitigated with relative ease through the Development Management process.
- “Significant moderate adverse effect predicted” – Potential to consider not allocating the site due to significant ecological effects, which may be able to be avoided by not allocating the site. Considerable on site avoidance and mitigation measures are likely to be required in order to ensure no impacts on the features present. Compensation may be required as a last resort. Potential to allocate the site with appropriate avoidance/mitigation conditions.
- “Significant major adverse effect predicted” – Sites in this category should only be allocated where it is proven that no suitable alternatives exist, and that suitable avoidance and mitigation measures could be implemented to ensure no residual impacts on the features affected. Compensation may be required as a last resort. Potential to allocate the site with appropriate avoidance/mitigation conditions.

1.18 Commentary will be provided to explain the scale of the impact.

Accessibility

1.19 National policy states that significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.¹³ National policy also supports the use of local services.¹⁴ The Local Plan strategy reflects this national policy. Therefore, the assessment of sites considers access to the following community services and facilities, along with employment sites:

- Train station
- Hourly or better bus route

¹² Nb. Although residential development is precluded within 400m of the Pebblebed Heaths SPA in Local Plan 2013-31 Strategy 47, as such sites are not ruled out as being unsuitable in the HELAA they will still be subject to assessment at Stage 3.

¹³ [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework) paragraph 105.

¹⁴ [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework) paragraph 93.

- Primary school
- Secondary school
- Convenience store/shop
- Post Office
- Community hall
- Pub
- Open space/allotment
- Children's play area
- GP
- Employment site (identified in Employment Land Review)

1.20 The site assessment should note the distance to these 12 services, facilities and employment sites using information from the HELAA, setting out how many are within 1,600m of the site (considered to be a reasonable upper limit for walking¹⁵). As the distances are calculated “as the crow flies”, any physical barriers (e.g. roads, railway lines, built form, topography) should be noted where they would significantly increase the distance for walkers and cyclists.

1.21 The assessment of employment sites is slightly different with regards to accessibility to facilities, as policies should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, in locations that are not well served by public transport.¹⁶ Nevertheless, employment sites will clearly benefit from being located in accessible locations that reflect the Local Plan strategy.

Other constraints

1.22 There are a variety of other factors that are important to consider when assessing sites for potential development. This aspect of the site assessment will record the following other site constraints, where relevant to the particular site:

- Best and most versatile agricultural land
- Noise
- Flood risk (including from rivers/sea, surface water, and if within a critical drainage area)
- Water quality
- Minerals and waste impact
- Physical constraints e.g. topography, contamination, adjacent uses
- Loss of important land use e.g. open space, employment, community facility
- Green wedge, as designated in the East Devon Local Plan 2013-31 or any neighbourhood plans

¹⁵ Most people will only walk if their destination is less than a mile away – [Planning for Walking](#) (CIHT, 2015); Walking distances are typically up to 2km – [Local Cycling and Walking Infrastructure Plans – technical guidance for local authorities](#) (DfT, 2017).

¹⁶ National Planning Policy Framework, December 2023, paragraph 89 [\[ARCHIVED CONTENT\]](#) (nationalarchives.gov.uk)

- Planning history – key issues raised in determined planning applications, planning appeals, and/or preparation of the Local Plan 2013-31 that are relevant to the site.
- Neighbourhood Plan policies.

Opportunities

1.23 Some sites may offer particular opportunities if they are developed, which should be noted in the assessment – such opportunities could include:

- Redeveloping previously developed land
- Potential to deliver higher than average densities (e.g. in close proximity to town centres and other locations well served by public transport)
- Connections into adjacent walking/cycling links and/or green infrastructure networks
- Delivering or contributing to infrastructure that could have wider benefits e.g. school, open space, other community facilities and services
- Continue existing street scene along site frontage
- Opportunities to reduce the site size to make it more acceptable to develop – this will need to be clearly justified, recognising that a smaller site may not be available or viable.

Requirement for further work

1.24 The site assessment may highlight further work that will be required when delivering the site, either to reflect the emerging Local Plan and its evidence, or through a planning application.

Final yield

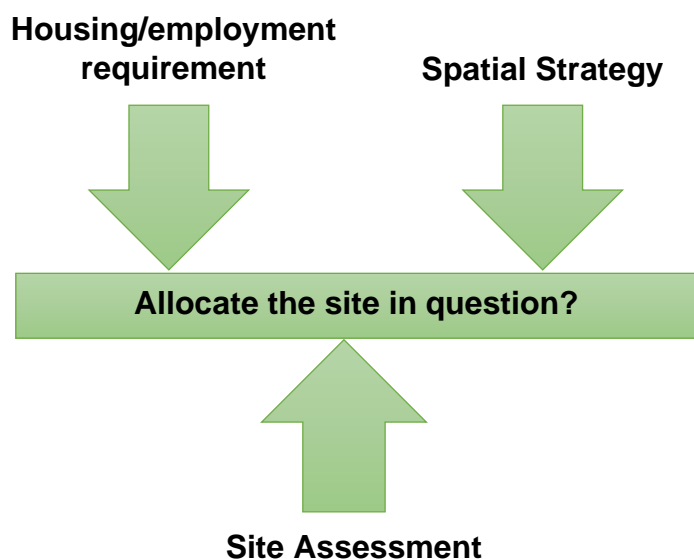
1.25 The yield shown at the start of the site assessment is calculated using the maximum in the HELAA methodology¹⁷. The site assessment may indicate that this should be reduced, for example to take account of landscape, ecological, or historic environment features; to achieve a higher yield in particularly accessible locations; or to reflect Local Plan consultation responses. Where this is the case, the yield will be adjusted to ensure that the Local Plan reflects a realistic site potential, and commentary will highlight parts of the site where density should be lower or built development avoided. Further bespoke assessment may be undertaken at some sites to inform the yield to be allocated in the Local Plan.

Stage 4: Site Selection

1.26 When all relevant sites have been assessed, Stage 4 considers which sites to allocate. The site selection process is a judgement that balances top-down strategic issues relating to the Local Plan district-wide housing requirement and spatial strategy for the distribution of development, with the specific factors in the site assessments. This judgement is summarised in figure 3 below, followed by an explanation of the three factors.

¹⁷ [Housing and Economic Land Availability Assessment - East Devon](#)

Figure 3: Stage 4 of Site selection process



Housing/employment requirement

1.27 The Local Plan district-wide housing requirement is 950 dwellings per year, equating to 20,900 dwellings over the plan period 2020 to 2042. The site selection process must ensure sufficient homes are allocated to meet the housing requirement (minus any windfall allowance) by ensuring there are deliverable sites for years one to five of the plan period; and developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.¹⁸ At least 10% of the requirement should be on sites of one hectare or smaller.¹⁹

1.28 Evidence in the Greater Economic Development Needs Assessment (January 2023) estimates a (mid-point) requirement for 3-8 hectares of land for offices, 60-69 hectares for industrial, and 8 hectares for logistics. Whilst there is a total potential supply of 106 hectares, there are questions over the deliverability of some of this land; and further work is required to assess employment sectors and deliverability in greater detail, before a final employment requirement is set out in the Local Plan. Nevertheless, as with housing, sufficient land should be allocated to meet the employment land requirement (minus any windfall allowance).

Spatial Strategy

1.29 The Local Plan directs development towards the most sustainable locations in East Devon, consistent with a spatial strategy to:

- Focus new development on the West End of East Devon, including a new settlement and other major strategic development close to Exeter
- Promote significant development at the Principal Centre of Exmouth and the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth to serve their own needs and that of wider surrounding areas
- Support development at the Local Centres of Broadclyst, Budleigh Salterton, Colyton, Lypstone, and Woodbury that meets local needs and those in the immediate surrounds

¹⁸ NPPF, December 2023, paragraph 69a, b [\[ARCHIVED CONTENT\] \(nationalarchives.gov.uk\)](#)

¹⁹ NPPF, December 2023, paragraph 70a [\[ARCHIVED CONTENT\] \(nationalarchives.gov.uk\)](#)

- Allow limited development to meet local needs at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill, Whimble.
 - Settlements not listed above are considered to be ‘open countryside’ for the purposes of the Local Plan, where more restrictive planning policies apply.
- 1.30 The site selection process should reflect this spatial strategy when considering whether to allocate the site in question, to ensure an appropriate level of development is proposed at each settlement.
- 1.31 Consistent with the spatial strategy, and to ensure a more nuanced approach, site selection should also consider the availability of jobs, community facilities and services at the settlement in question.²⁰ This promotes sustainable development by linking growth to the availability of jobs and services in the settlement, which may vary slightly despite being within the same defined ‘tier’ as other settlements, and therefore subject to the same overarching strategy set out above. For example, Seaton and Honiton are both identified as ‘Main Centres’ and proposed to have moderate levels of development. However, Seaton has fewer jobs, lacks some strategic facilities (train station, secondary school, swimming pool), and is located in a less accessible location. Therefore, the spatial strategy should direct less development to Seaton than Honiton.
- 1.32 As the Local Plan period began in 2020, dwelling completions or commitments from this year until the base date of the Site Selection report should be included when considering the spatial strategy. There may be settlements where high levels of completions and/or commitments means that lower levels of ‘new’ housing are appropriate to ensure consistency with the Local Plan spatial strategy.

Site assessment

- 1.33 As previously explained, Stage 3 assesses each site against a series of key planning issues. The site assessment ensures a consistent level of information is available for each site, to inform site selection.
- 1.34 For sites that are selected for allocation at Stage 4, a Historic Environment Site Assessment (HESA) will be undertaken that will contain more detail on the potential impacts of developing the site upon heritage assets. This will reflect Steps 2 – 4 in the approach set out by Historic England²¹, but in a proportionate way by only assessing proposed site allocations. This will consider the impact upon *up to five heritage assets* that would be most significantly affected by the site, unless there are exceptional circumstances that warrant consideration of a larger number of heritage assets (e.g. if the site is particularly large, or surrounded by more than five “assets of the highest significance” set out in NPPF paragraph 206b). In addition, the HESA will group heritage assets together where the impact is likely to be similar, for example a group of adjacent listed buildings will be considered together.
- 1.35 Before sites can be selected for allocation in Flood Zone 2, the Sequential Test will be applied to consider “reasonably available” sites in flood zone 1 and will also be subject to a Level 2 Strategic Flood Risk Assessment.

²⁰ See further detail in ‘The Role and Function of Settlements’: [1a. Role and Function of Settlements_report_v3 final draft for SPC.pdf \(eastdevon.gov.uk\)](#)

²¹ [The Historic Environment and Site Allocations in Local Plans \(historicengland.org.uk\)](#)

- 1.36 Similarly, allocations that are considered to be “major development” located in a National Landscape (previously known as Areas of Outstanding Natural Beauty) will be justified by an assessment of need, alternative sites outside the National Landscape, and any detrimental effects.
- 1.37 For smaller scale sites, it may be considered more appropriate to include them within the settlement boundary rather than identifying them as site allocations.

Conclusion

- 1.38 The three overriding factors – housing/employment requirement, spatial strategy, and site assessment – should be considered together when deciding which sites to select for allocation in the Local Plan. Site selection will reflect the NPPF paragraph 181 by allocating land with least environmental or amenity value, where consistent with other policies in the NPPF.
- 1.39 The Site Selection report will explain whether each site should be allocated, or not, with reasons why, based upon the housing requirement, spatial strategy and site assessment. It follows that sites that perform well against these three interlinking factors should be allocated for development; whilst sites that do not perform as well as other site options should not be selected for allocation.