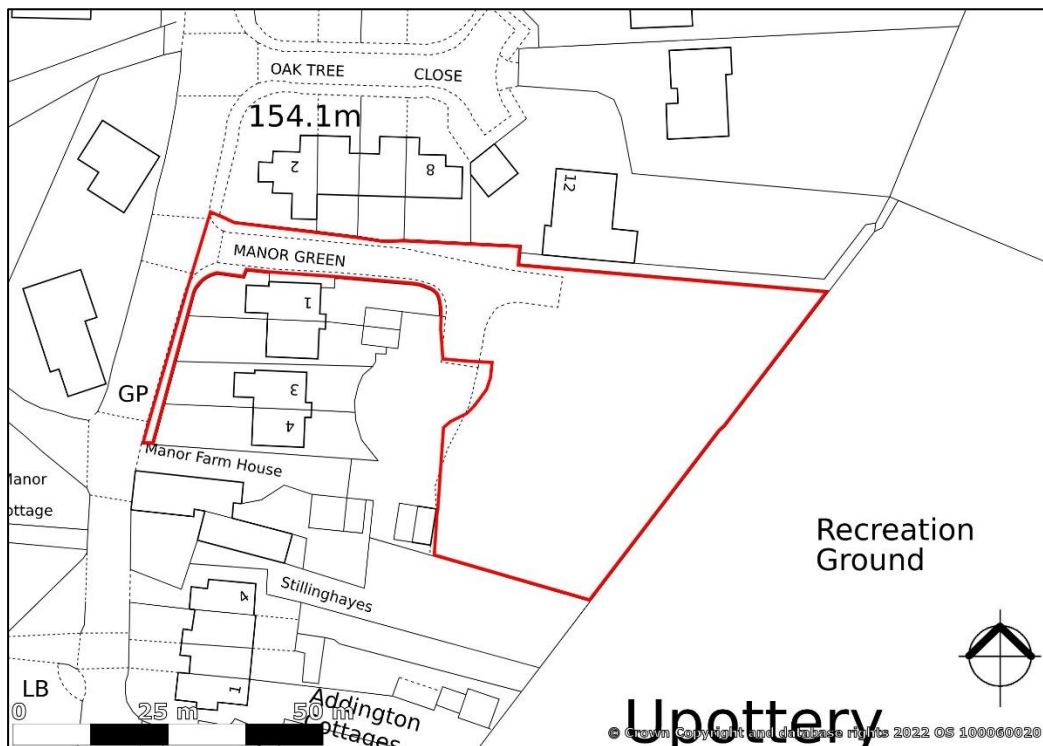


EAST DEVON DISTRICT COUNCIL  
DRAFT LOCAL PLAN CONSULTATION  
LAND AT MANOR GREEN, UPOTTERY,  
HONITON EX14 9PJ



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Prepared for: Islandwide Limited

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Document Checking

	Prepared By	Date	Checked By	Date	Approved By	Date
Signature	AJP	06.01.2023				

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## **1.0 INTRODUCTION**

### **1.1 Background**

1.1.1 East Devon District Council (EDDC) is reviewing its Local Plan. As part of this process, the Council is undertaking a public consultation exercise on the East Devon Local Plan 2020-2040 Preferred Options (Regulation 18) Consultation Draft Plan, running from 7th November 2022 to 15th January 2023.

1.1.2 Representations have been made previously on this site under the last Call for Sites and the Issues and Options Regulation 19 consultation.

1.1.3 This Representation is prepared on behalf of Islandwide Limited. Islandwide Limited is in the process of purchasing Land At Manor Green, Upton, Honiton EX14 9PJ, with a view to future housing development at this site.

### **1.2 Scope of the Representation**

1.2.1 This representation will respond on behalf of Islandwide Limited to each relevant section and question raised in the Council's 'Commonplace consultation', with a greater emphasis on the spatial strategy and the site assessment process.

## **2.0 CHAPTERS 1 & 2 - INTRODUCTION, POLICIES AND OBJECTIVES**

### **2.1 Visions and objectives of the plan**

2.1.1 Islandwide Limited scores the visions and objectives of the plan as 75/100 for the following reasons:

*Islandwide Limited supports the Plan Objectives, which are considered to be Sound, subject to these objectives being applied in a balanced manner.*

## **3.0 CHAPTER 3 - THE SPATIAL STRATEGY OF THE PLAN**

### **3.1 Strategic Policy 1: Spatial Strategy**

3.1.1 Islandwide Limited scores 'Strategic Policy 1: Spatial Strategy', 25/100 for the following reasons:

*Islandwide Limited supports the principle that significant development should be focussed on the more sustainable settlements.*

*However, paragraph 79 of the NPPF states that "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support*

local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”

*It is therefore considered that Tier 4 settlements, identified as Service Villages in the Plan, are capable of accommodating modest growth in a sustainable manner, that would go beyond “limited development to meet local needs”.*

*Islandwide Limited further considers that Upottery should be included within the list of Tier 4 settlements under Strategic Policy 1.*

*At the meeting of the Strategic Planning Committee on 8<sup>th</sup> February 2022, Members considered whether more settlements should be included within Tier 4 of the hierarchy. Upottery was one of the villages specifically identified for consideration in this respect, with the minutes of the meeting noting a comment that “Villages such as Awliscombe, Yarcombe and Upottery which do have modest services could deliver a small number of houses but are being discounted...” Members resolved that they wished to identify a higher number of settlements in Tier 4.*

*At the subsequent meeting of the Strategic Planning Committee on 8<sup>th</sup> March 2022, Members arrived at a contrary resolution that there should in fact be no extension to Tier 4 of the settlement hierarchy.*

*The debate over whether or not to include Upottery within Tier 4, and the contradictory resolutions adopted by the Strategic Planning Committee at its meetings in February and March 2022, highlights that this is very much a borderline matter and that there is a strong case for including Upottery within Tier 4, for reasons set out below.*

*Islandwide Limited understands that Upottery was omitted from Tier 4 as the village lacks a shop. However, by other measures as set out in the Role and Function of Settlements document, Upottery ranks highly in relation to many of the other 23 settlements that are presently identified within Tier 4 in the Consultation Draft plan.*

- *Upottery has an overall population of 699. 10 of the identified Tier 4 settlements have smaller populations.*
- *Upottery has a working age population of 516, with 73% of those being economically active. 13 out of the 23 identified Tier 4 settlements have a smaller working age population.*
- *In terms of jobs, Upottery is a net importer of labour with 145 local jobs fulfilled by people travelling in from outside the parish. Of the 23 identified Tier 4 settlements, 18 of these have fewer jobs.*
- *Upottery is also one of the very few villages in the area offering ultrafast broadband, beneficial to those working in the village and particularly the growing numbers working from home.*
- *Upottery has a range of local services including a primary school, community hall, pub, sports field, play area and bus service. The Role and Function of Settlements document shows that 4 of the other identified Tier 4 settlements have equal or fewer services in comparison with*

## *Upottery.*

*Upottery does not have a shop, but as recognised in the National Planning Policy Framework, paragraph 79, a modest level of additional development can encourage the provision of additional facilities, or support services in a village nearby.*

*The village is therefore sustainable, with a reasonable range of local services, good employment provision and a good size population, also serving a wider hinterland, and compares favourably in many respects with some of the other Tier 4 settlements. Geographically the north eastern part of East Devon is underprovided for with designated Local Plan settlements with only Dunkeswell and Broadhembury in that general area.*

*Upottery has opportunities for limited sustainable development not least at Land At Manor Green where Islandwide Limited considers there to be strong potential for up to 5 homes. Islandwide Limited understands that the Parish Council and Local District Councillor have previously been keen to see this land developed.*

*Islandwide Limited therefore considers that the Plan is Unsound in this respect, being neither positively prepared, justified, effective, nor consistent with national policy.*

*Islandwide Limited proposes that the text of Strategic Policy 1 should be amended to include Upottery within the list of Tier 4 Service Villages, and that a settlement boundary should be designated for Upottery, to include provision for housing development at Land At Manor Green.*

*Islandwide Limited further proposes that the text of Strategic Policy 1 should be amended to provide for moderate growth within Tier 4 Service Villages, appropriate to their scale and identity.*

## **3.2 Strategic Policy 2 - Housing Distribution**

3.2.1 Islandwide Limited scores 'Strategic Policy 2: Housing Distribution', 25/100 for the following reasons:

*Islandwide Limited considers that whilst significant housing development should be directed towards the more sustainable settlements, a greater level of development should be allocated within the smaller settlements, including the Tier 3 Local Centres and Tier 4 Service Villages.*

*This would ensure a more even spread of development across the District, create opportunities for moderate growth within sustainable settlements that offer a reasonable range of facilities and public transport links, and provide a basis to support and encourage growth in local services.*

*Village developments will generally involve smaller sites, for fewer homes, than those provided for in the Tier 1 and 2 settlements. These smaller sites are typically more straightforward and less time consuming in terms of plan making, decision taking, and construction, such that these sites will represent a supply chain of housing opportunities that will be readily deliverable within the short term, making a genuine contribution to the 5 year housing land supply for the District.*

*Development in smaller settlements would also provide greater opportunities for small to medium sized housebuilders and support this important sector of the industry.*

*Islandwide Limited therefore considers that the Plan is Unsound in this respect, being neither positively prepared, justified, effective, nor consistent with national policy.*

*Islandwide Limited proposes that the text of Strategic Policy 2 should be amended to provide a greater level of housing growth within the Tier 3 and 4 settlements.*

### **3.3 Strategic Policy 3: Levels of future housing development**

3.3.1 Islandwide Limited scores 'Strategic Policy 3: Levels of future housing development', 75/100 for the following reasons:

*Islandwide Limited considers that the draft Plan provides for a minimum level of housing growth to meet the identified housing requirement for the District, and in this respect is considered to be generally Sound, subject to the comments below.*

*Islandwide Limited supports the proposal for a 'supply headroom' of about 10% to provide flexibility in housing supply over the Plan period.*

*It is considered however that a greater proportion of housing should be delivered on small to medium sized sites and that a higher minimum provision should be adopted, for reasons set out in the response of Islandwide Limited to 'Strategic Policy 2: Housing Distribution'. The Plan should also include a definition of small to medium sized sites.*

*Islandwide Limited therefore considers that the Plan is Unsound in this respect, being neither positively prepared, justified, effective, nor consistent with national policy.*

*Islandwide Limited proposes that paragraph 5 of Strategic Policy 3 should be amended to provide at least 15% or 20% of housing supply over the plan period to be provided on small and medium sized sites.*

### **3.4 Strategic Policy 6: Development inside Settlement Boundaries**

3.4.1 Islandwide Limited scores 'Strategic Policy 6: Development inside Settlement Boundaries', 100/100 for the following reasons:

*Islandwide Limited supports the principle that development within settlement boundaries should be supported in principle, and considers the Plan to be Sound in this respect.*

### **3.5 Strategic Policy 7 : Development beyond Settlement Boundaries**

3.5.1 Islandwide Limited scores 'Strategic Policy 7 : Development beyond Settlement Boundaries', 25/100

for the following reasons:

*Islandwide Limited considers that there should be some flexibility in the application of policy on settlement boundaries, in order to allow small scale development on sites that may fall outside the settlement boundary but are found to be suitable and sustainable for housing growth, or that fall into the category of previously-developed land.*

*This would have the benefit of providing development opportunities on smaller sites around the settlement, and help to generate a supply of smaller sites that would be too small to consider specifically allocating for development.*

*Islandwide Limited therefore considers that the Plan is Unsound in this respect, being neither positively prepared, justified, effective, nor consistent with national policy.*

*Islandwide Limited proposes that Strategic Policy 7 should be amended to permit small scale housing development outside the settlement boundaries, or to define settlement boundaries more loosely in order to provide opportunities for smaller sites to come forward.*

## **4.0 CHAPTER 4 - ADDRESSING HOUSING NEEDS AND IDENTIFYING SITES FOR DEVELOPMENT**

### **4.1 EDDC Approach to undertaking site assessment work**

4.1.1 Islandwide Limited scores this policy 0/100 for the following reasons:

*Islandwide Limited considers that the site assessment process has not been undertaken appropriately in relation to Upottery, which is considered to be appropriate for designation as a Tier 4 Service Village, and objects to the non-allocation of Land At Manor Green Upottery for housing development.*

*Islandwide Limited therefore considers that the Plan is Unsound in this respect, being neither positively prepared, justified, effective, nor consistent with national policy.*

*Islandwide Limited proposes that Upottery should be designated as a Tier 4 Service Village, and that Land At Manor Green should be allocated for housing development.*

## **5.0 CHAPTER 6 - STRATEGY FOR THE DEVELOPMENT AT PRINCIPAL CENTRES, MAIN CENTRES AND SERVICE VILLAGES**

### **5.1 Strategic policy 26 – Development at service villages**

5.1.1 Islandwide Limited scores 'Strategic policy 26 – Development at service villages' 0/100 for the following reasons:



*Islandwide Limited considers that Upottery should be included as a service village within Tier 4, and objects to the non-allocation of Land At Manor Green Upottery for housing development. The site is considered to be highly suitable for this use, for the reasons set out below.*

- The site extends to approximately 0.5 acres (0.2 hectares) and is considered to be potentially suitable for up to 5 homes (density up to 25 dwellings per hectare).*
- The site is located at the heart of the village within a predominantly residential context, with existing homes to the north, west and south, and the sports field to the east.*
- Development in this location will not extend the settlement into open countryside nor have harmful impact on landscape character or the AONB.*
- The land is generally level and there are no known issues with ground conditions that might impact on future development.*
- Trees along the eastern boundary may be retained post-development for screening, amenity and ecological benefit.*
- The site is in a sustainable location within convenient walking or cycling distance of the local facilities within Upottery, including the primary school, community hall, pub, sports field, play area and bus stops. Development will support and sustain these local services to the benefit of the village as a whole.*
- In the 2022 HELAA analysis for site Upot\_01, it was noted that “Upottery Primary has some capacity to support development.”*
- There are no known ecological constraints on site.*
- There are no identified heritage assets on or within close proximity to the site that could be significantly adversely affected by the development proposed.*
- There is no known contamination risk on site.*
- The site is not at risk of flooding and Islandwide Limited are not aware of any local issues with surface water flows that might prejudice the development proposed.*
- Mains water, drainage, electricity, telephone and broadband services are all available on or near to the site.*
- The site is crossed by an overhead electricity line. This is understood to be a service line and could potentially be relocated as part of a development proposal.*
- The site has direct connection to the public highway, and the junction of Manor Green with the main village road appears to be adequate to safely accommodate the additional traffic to be generated.*
- The public footpath running along the northern boundary to the site would not be materially affected by development.*
- New homes could be readily designed so as to keep any overlooking or loss of privacy to neighbouring residential properties to a minimum, and to maintain appropriate spacing between dwellings.*

*Islandwide Limited therefore considers that the Plan is Unsound in this respect, being neither positively prepared, justified, effective, nor consistent with national policy.*

*Islandwide Limited proposes that Strategic Policy 26 should be amended to allocate Land At Manor Green as a site for housing development for up to 5 homes.*

## **6.0 CHAPTER 7-TACKLING THE CLIMATE EMERGENCY AND RESPONDING TO CLIMATE CHANGE**

### **6.1 Strategic Policy 27 – Climate Emergency**

6.1.1 Islandwide Limited scores 'Strategic Policy 27: Climate Emergency' 50/100 for the following reasons:

*Islandwide Limited supports the principle of moving to a low carbon or carbon neutral scenario. However, this should not be at the expense of compromising development viability, or going beyond the already stringent requirements of the Building Regulations.*

*Islandwide Limited therefore considers that the Plan is Unsound in this respect, being neither positively prepared, justified, effective, nor consistent with national policy.*

*Islandwide Limited proposes that the text of Strategic Policy 27 should be amended to clarify that carbon neutral development should be an aspiration and not an absolute requirement.*

### **6.2 Strategic Policy 28: Net-Zero Carbon Development**

6.2.1 Islandwide Limited scores 'Strategic Policy 28: Promoting renewables and zero carbon energy 50/100 for the reasons set out in relation to Strategy 27.

## **7.0 CHAPTER 08 - MEETING HOUSING NEEDS FOR ALL**

### **7.1 Strategic Policy 40: Affordable Housing**

7.1.1 Islandwide Limited scores 'Strategic Policy 40: Affordable Housing 100/100 for the following reason:

*Islandwide Limited supports the principle of appropriate affordable housing provision on sites of 5 units or higher. The principle that the requirement should be reduced from the current 50% across most of the District, to 35%, is also supported, as is the proposal that at least 10% of affordable housing should be affordable home ownership products. The Plan is therefore considered to be Sound in this respect.*

### **7.2 Strategic Policy 41 : Housing to meet the needs of older people**

7.2.1 Islandwide Limited scores 'Policy 41 : Housing to meet the needs of older people' 75/100 for the following reasons:

*Islandwide Limited supports the principle of appropriate housing provision to meet the needs of older people, but only where there is evidence of such need. The Plan is therefore considered to be generally Sound in this respect.*

### **7.3 Strategic Policy 42 : Accessible and Adaptable Housing**

7.3.1 Islandwide Limited scores 'Policy 42 : Accessible and Adaptable Housing' 100/100 for the following reasons:

*Islandwide Limited supports the provision of accessible and adaptable housing. The Plan is therefore considered to be Sound in this respect.*

### **7.4 Strategic Policy 43 : Market housing mix**

7.4.1 Islandwide Limited scores 'Strategic Policy 43 : Market housing mix' 50/100 for the following reasons:

*Islandwide Limited supports the provision of a mix of property sizes. However, it is considered that this should not be applied as a blanket policy across all sites, since development also needs to take into consideration the existing character and density of the locality, particularly with reference to small and medium sized sites. There will be occasions where local characteristics dictate overprovision of larger, or smaller, homes on a particular site.*

*Islandwide Limited therefore considers that the Plan is Unsound in this respect, being neither positively prepared, justified, effective, nor consistent with national policy.*

*Islandwide Limited proposes that the text of Strategic Policy 43 should be amended to propose that this policy should be applicable only to larger housing sites and / or to take the local character into consideration.*

## **8.0 CHAPTER 11 - PRIORITISING SUSTAINABLE TRAVEL AND PROVIDING THE TRANSPORT AND COMMUNICATIONS FACILITIES WE NEED**

### **8.1 Strategic Policy 65 : Walking, cycling, and public transport**

8.1.1 Islandwide Limited scores 'Strategic Policy 65 : Walking, cycling, and public transport' 100/100 for the following reasons:

*Islandwide Limited supports the principle of a "20 minute neighbourhood", and the recognition that this target may not be achievable in rural areas. The Plan is therefore considered to be Sound in this respect.*