

srs/508/12/1

29 September 2015

Amanda Combes
Programme Officer
East Devon District Council
Knowle
Sidmouth
EX10 8HL

Dear Amanda

RE: NEW LOCAL PLAN EVIDENCE AND FURTHER SUBMISSIONS - PROPOSED AMENDMENTS TO POLICY 20 AXMINSTER

As you are aware, I act on behalf of The Crown Estate who has considerable land interest in Axminster, and specifically the land allocation to the east of the town identified in policy 20.

You have invited further comment to be made on the additional papers produced by the Council. In respect of the housing supply and overall housing numbers issues, my client has no further comment to make at this stage. My earlier representations and comments put forward at the Examination continue to reflect our position notwithstanding the additional work and revisions now being suggested.

However, I notice that there are some textural changes to Policy 20 relating to Axminster now being suggested. I direct my comments specifically to those changes now being proposed in respect of the Nutrient Management Plan for the River Axe.

I suggest that the changes to the wording of the policy as now proposed could have knock-on consequences for the delivery of the site in a timely manner, such that the Council's five year housing land supply projections could be negatively affected.

The ultimate end result from a developer point of view is the same in both policy wording scenarios – any application for development will need to demonstrate that the SuDS and sewage treatment will meet the required standards for the River Axe, ie, it will be important to demonstrate that there will be no impacts to the water quality, or quantity, entering the River Axe SAC as a consequence of the development either alone or in combination with any other plan or project. My client understands and accepts this position, and further that the demonstration of no impacts needs to be shown prior to the grant of any planning permission.

However, whilst the original wording suggested that a Nutrient Management Plan might not be required, the revised wording suggests that one is now required. Furthermore, the revised

Clifton Heights, Triangle West, Bristol BS8 1EJ

T: 0370 777 6292 F: 0117 910 0506 E: info@rapleys.co.uk www.rapleys.co.uk

Also at: London W1 Huntingdon Edinburgh and Manchester

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wording also suggests that such a plan and the timetable for one, is to be agreed between the Council, Environment Agency and Natural England. All of this has to be agreed and in place BEFORE planning permission is granted. The onus is thus on the statutory bodies to take this Nutrient Management Plan forward, against which any development impacts can then be measured. The developer is thus totally reliant on external forces to agree a timetable for producing and then agreeing the Plan. This timetable may not meet developer aspirations for bringing the site forward and thus the delivery of much needed housing is thwarted.

A delay in this context is wholly unacceptable to my client.

Furthermore, there appears to be no further work or evidence produced between the wording put forward in March 2015 and that now being suggested in September 2015 to explain the reason for the changes, and particularly why a Nutrient Management Plan is now required.

Consequently, my client wishes to see the original wording of policy 20 reinstated, as presented to the Inspector within the Revised Draft New East Devon Local Plan (Proposed Further Changes at March 2015).

Yours sincerely

Sarah R Smith BA (Hons) MRTPI
Partner – Rapleys LLP
07787 527109
srs@rapleys.co.uk