



CHARTERED TOWN PLANNERS

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EAST DEVON LOCAL PLAN 2020-2040

PREFERRED OPTIONS REG.18 CONSULTATION DRAFT PLAN – AUTUMN 2022

REPRESENTATIONS ON BEHALF OF WALDRONS (SW) LTD

Introduction

Bell Cornwell LLP acts as planning consultant for Waldrons (SW) Ltd, the long standing owner of large areas of agricultural land in East Devon. Our client's interests in this proposed local plan process focus around Waldrons Farm in Farringdon. As well as being farmers, our clients have commercial land interests and have undertaken several rural diversification projects.

In this local plan (and as part of previous SHELAA work) Waldrons Farm has been given the reference Waldrons Farm, Sidmouth Road (Farr_02). It is being promoted for residential development as part of the proposed New Town which forms an integral part of the allocations proposed in this Local Plan process. Our client's land is located in the areas identified as Option 1 and Option 2. Waldrons Farm and the associated land stretches to approximately X ha, and has direct road access onto the A3052.

In view of the above, our client has significant interest in the future local plan for the district. Against this background, the following comments are made on the draft policies within the East Devon Local Plan Preferred Options. These follow on from the representations made to earlier drafts of the plan, notably the Issues and Options version, and the Call for Sites, in 2021.

We have reviewed the evidence provided by the LPA, and we note that through the Technical Evidence Report on New Community Site Options (produced by CBRE) and the subsequent report by officers to the Strategic Planning Committee (dated 1st November 2022) that Option 1 is the preferred site option. Our client fully endorses this position and their land is available to contribute to a new community in this location.

The Vision for East Devon

The draft local plan sets out a proposed vision for East Devon and the proposed New Town. This seeks to provide better homes and communities for all, promote a greener district, which address climate change and supports the natural environment, and encourage a more resilient local economy. Waldrons (SW) Ltd supports the vision for both the New Town and East Devon.

03 The Spatial Strategy of the Plan

1. Strategic Policy – Spatial Strategy

The overall strategy is to focus most development within the West End of the district. This is to include a new town and other major strategic developments close to Exeter. Our client's land falls within the area known as Option 1 and Option 2. We note the LPA's preference at this stage to promote option 1. Our client sites faces directly onto the A3052 and can be a key gateway into this town.

The settlement hierarchy then identifies one principal settlement (Exmouth), where significant growth is proposed. Below this are main centres, which are towns that are also able to accommodate significant growth, followed by local centres, where development will be supported.

A dispersed spatial strategy that increases the number of locations where some development can be accommodated is supported. This should ensure that local needs are met more adequately.

However, it is logical for the West End to play an important role, given the area's proximity to Exeter, and in the case of Waldrons Farm, our client fully endorses this position. It is noted that up to 2040 around 2,500 new homes are required on allocated land and our client's land which fronts directly onto the A3052 can be a logical first phase of development given access into the site already exists.

Beyond 2040 around 5,500 additional new homes on allocated land, and we would anticipate that these will be delivered on land located more centrally within the allocation.

Our client's land is available to be part of Option 1 or 2 as set out on the draft inset maps, and this rep seeks to confirm our client's absolute willingness to work as part of a consortium of landowners to deliver a new town in this location. The land can be made available as required.

2. Housing Distribution

We would refer officers to the housing distribution table below which is set out in the Local Plan under Strategy 2.

2. Strategic Policy – Housing distribution						
New housing will be distributed across East Devon in accordance with the table below. The housing numbers are gross and relate to the period 2020 to 2040, the new town has a longer term vision that takes into account the likely timescale for delivery and will see development of an extra 5,500 homes beyond 2040.						
Settlement	Completions 2020-22	Commitments	Preferred Sites	2nd Choice	Total Allocations	Grand Totals
Western side	841	1,800	7,250	0	7,250	9,891
New town	0	0	2,500	0	2,500	2,500
North of Topsham	0	0	580	0	580	580
Cranbrook	543	801	4,170	0	4,170	5,514
North of Blackhorse	298	999	0	0	0	1,297
Other locations	0	0	0	0	0	0

Figure 1 - Proposed housing distribution across in East Devon in the Draft Local Plan

Our client is supportive of the housing numbers proposed for the new town, and their land is available for residential development. We would ask officers to note that our client's land with it direct access onto the A3052 could form an early phase of residential development, part of the initial 2,500 houses proposed up to 2040. Obviously the LPA are due to commission further masterplanning work across 2023, and we would ask officers to note the above in any such exercise – the land is available for early delivery of housing.

3. Strategic Policy – Levels of future housing development

The new local plan should plan for at least the minimum housing requirement proposed (946 homes per year) in order to introduce greater flexibility into the district's housing supply and ensure a properly robust supply of housing. It is crucial that the words 'at least' remain in the policy.

Paragraph 3 of the draft policy states that provision will be made for a supply headroom of approximately 10% to provide housing supply flexibility in the district in the plan period and this is supported. However, it is noted in the supporting text (paragraph 3.17) that the potential housing sites being considered in this draft local plan only provide about 8% headroom. This surely suggests that additional sites need to be considered for housing development, otherwise the new local plan will be at risk of not providing sufficient supply flexibility.

Increasing the overall supply of housing will help to increase the amount of affordable housing that is provided for the district. The draft plan requires an affordable housing requirement of 4,070 dwellings but the current evidence indicates realistic prospects of delivering just 3,551 dwellings in the plan period. This is a shortfall of 519 dwellings and, of course, there is the possibility that some of the planned for 3,551 affordable homes will not come forward. Rather than relying on qualifying sites to be able to deliver a higher percentage of affordable housing, a safer approach would be to allocate additional sites in the local plan.

Paragraph 8 of the draft policy will set out the housing provision requirements for designated areas in East Devon. It is not possible to comment on the approach at this stage as the data on housing provision requirement is not yet available – the draft policy states this information will be completed following consultation on the methodology for identifying the scale of housing provision requirement in Designated Neighbourhood Areas. The right to comment is reserved for when this data is publicly available. Clearly Waldrons Farm is located in the parish of Farringdon, but any new town (and its associated boundary allocation) would supersede the policy position in the Neighbourhood Plan for this area.

A key element of the draft Local plan's strategic approach is to deliver a new settlement on land to the east of Exeter, around the A3052 corridor. Three different options are presented. The final choice of option is still to be decided. As matters stand LPA preference is for option 1, and with regard to Waldrons Farm our client fully supports this approach. Presuming that the delivery of a new settlement is carried forward into the final version of the local plan, it is important that masterplan work is carried out in 2023 to understand and seek further assurances that housing numbers could be delivered. This will give certainty all parties and allow the LPA to plan for greater certainty in terms of deliverable housing numbers across the district.

4. Strategic Policy – Employment Provision and Distribution Strategy

The draft policy states that provision will be made for a net increase of sufficient new employment floorspace to meet need and ensure that a choice of appropriate land is available in sufficient quantity, and of the right quality, to drive the economic growth of, and support prosperity in, East Devon. More clarity is needed on precisely what is meant by ‘a net increase’ and ‘sufficient new employment floorspace.’

It is clear that there is a continuing shortage of sites available for small and medium sized businesses across the district, outside of the West End. These businesses play an important role in the local rural economy and it is vital that proper provision be made for them in the right locations, for example, close to existing operations and main road networks.

The scale of new development/level of need for the district has not yet been decided upon – the draft policy states that this will be informed by the ongoing Economic Development Needs Assessment (EDNA), which will be ‘available in time’. The EDNA will also inform the Council’s site selection and site capacity estimates.

Whilst it is logical for existing employment areas to continue to be the primary locations for employment uses, the strategic policy must make sufficient provision for windfall employment development to come forward as opportunities present themselves and cannot be overly prescriptive.

In conclusion, there is insufficient evidence to inform the employment strategy at this time, with the EDNA not having been completed. Ultimately, a sufficient supply of all types of employment land needs to be made available across the district and it is logical for there to be a focus on future-proofing established employment locations.

6. Development within Settlement Boundaries

Policy states that within the settlement boundaries defined on the Policies map development will be supported in principle. This approach is supported... but in the case of Waldrons Farm and site Farr_02, this is conditionally on the basis that our client's land is shown as being located within the settlement boundary as a suitable site for development as part of either Option 1 or 2 for the proposed New Town.

7. Strategic Policy – Development beyond Settlement Boundaries

Whilst it is important to protect the landscape, amenity and environmental qualities of the East Devon countryside, there must be sufficient flexibility in the new local plan to allow windfall development to come forward and be judged on its own site specific merits to ensure that the needs of the rural communities can be met. Greater flexibility therefore needs to be built into this policy.

05 Future growth and development on the western side of East Devon

8. Development of a second new town east of Exeter

The inclusion of site Farr_02 (land at Waldrons Farm, Sidmouth Road) for residential-led development is supported as part of the proposed second new town. The site is within the allocation for option 1 and option 2 as set out on the relevant inset map. Our client would be willing to participate in a new town project on either the option 1 or the option 2 site, but note that at the current time the LPA have preference for option 1. Having reviewed the evidence base behind the plan at the current time, this is a logical choice.

Having regard to the assessment work undertaken by CBRE, Option 1 is the best scoring location on important issues including highways, utilities, net zero carbon, climate resilience, and crucially deliverability.

We note that option 1 is largely being promoted by two parties, and our client (whilst owning a smaller piece of land) would be happy to work as part of a consortium should the scenario arise.

In accordance with the committee report which forms part of the evidence base (report to Strategic Planning Committee on 1st November 2023) we note that further masterplan work will be required across 2023. Our client is prepared to engage in this process should this be of benefit and would like to put their site forward for housing in the first instance.

Looking at the reasoning behind the policy, the possible locations for the new town have been identified out of the SHELAA submissions made over the last few years – our clients site being Farr_02. We note that such a scale of development requires a wide range of services and facilities to be provided at the new town with sufficient monies generated to support substantive infrastructure provision.

As the LPA allude to, a new town will be a long time in the planning and it is unlikely that any new homes will be completed until around 2030. On this basis, and at build out rates (as set out by the LPA) climbing to around 300 new homes per year, we would like to reiterate the availability of our client's land to be an early phase of delivery in the first 2,500 homes to be delivered for the New Town.

09 Supporting Jobs and the Economy and Vibrant Town Centres

52. Employment development in the countryside

The provision for the intensification of existing employment businesses in the countryside is supported.

However, draft policy 52 explicitly states that:

“For avoidance of doubt this policy applies to specific companies or businesses and their operational premises and is not applicable to business parks, industrial estates or similar where the business in question is the operation of that park or site.”

If that wording remains in the final version of the policy, then what opportunities will be provided in the new local plan for the expansion of existing business parks / industrial estates / employment sites, which is crucial for the prosperity of the rural economy? The wording of the policy must reflect the supporting text (paragraph 9.22), which states that:

“It is important for East Devon to develop its employment base and where established sites are successful, an intensification of employment uses or extension of an existing employment site can be considered if this supports additional employment accessible to local communities.”

Development opportunities in the rural areas are more limited and the success of very well established sites and the potential for them to expand to meet demand needs to be supported with the inclusion of explicit local plan policies.

53. Farm Diversification

The inclusion of a rural diversification policy is supported strongly. It is becoming increasingly necessary for farmers to diversify in order to retain a viable business. Current Local Plan Policy E4 has proved successful in bringing about complementary new uses with economic benefits for rural areas, and it is the correct approach to keep such a policy.

As drafted, draft policy 53 is more restrictive than its predecessor by expressly supporting employment uses, rather than allowing *'proposals to diversify and expand upon the range of traditional agricultural related economic activities undertaken in rural areas....'* A more restrictive approach is likely to prevent other complementary uses that would bring about social and economic benefits, but which would fall outside of traditional employment uses classes, from coming forward, which could prevent additional and much needed income streams. Paragraph 1 of draft policy 53 does not need to be so restrictive in terms of uses – the criteria within paragraph 3 of the policy will ensure the acceptability of proposals.