

East Devon District Council  
Planning Policy Team  
Blackdown House  
Border Road  
Heathpark Industrial Estate  
Honiton  
EX14 1EJ

**Date:** 12 January 2022

**Our ref:** 31650/01/PR/CNw/26078696v3

Dear Sir / Madam

## **East Devon Local Plan - Preferred Options (Regulation 18) Consultation**

On behalf of our client, the Church Commissioners for England (CCE), we enclose representation to the East Devon Local Plan Preferred Options (Regulation 18) Consultation.

CCE is a registered charity that supports the work and mission of the Church of England across the country. Its investment policy is to hold a diverse portfolio of investments across a broad range of asset classes consistent with its ethical guidelines. Its Strategic Land team brings forward land for new housing development with the aim of delivering new homes and employment opportunities which support and enhance the local community. Many new developments also include new schools, community facilities, and new areas of open space, which benefit not only new residents but also neighbouring communities.

CCE owns land in Clyst Honiton, East Devon, known as the Clyst Honiton Bypass Site ('the site'). The site has previously been submitted to the East Devon District Council (EDDC) Call for Sites consultation, as well as the to the Clyst Honiton Neighbourhood Plan and Greater Exeter Strategic Plan Call for Sites in April 2017. A plan showing the location of the site is included at Appendix 1. CCE continues to engage with the Clyst Honiton Steering Group in relation to the draft Neighbourhood Plan and emerging Neighbourhood Development Order.

### **Response to the Preferred Options Consultation**

In the context of the above, the remainder of this letter sets out CCE's response to the EDDC Preferred Options (Regulation 18) Consultation. CCE generally supports the vision and objectives set out in the consultation document. We comment in relation to specific polices below.

#### **Strategic Policy 1: Spatial strategy**

CCE supports Strategic Policy 1 and the focus for new development on the western side of the district, including a new town and other strategic developments east of Exeter. In particular, we note that Clyst Honiton is identified as 'open countryside' and we would emphasise that it is a sustainable and suitable

location for development given the good connectivity to the existing road network, Exeter Airport and Exeter.

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

CCE is supportive of the approach set out in Strategic Policy 3 to set housing provision requirements for designated neighbourhood areas, including Clyst Honiton. We note that these housing provision requirements, including for Clyst Honiton, are to be completed following consultation on the methodology. It is important that the final housing requirements for these areas should accommodate the identified sites within emerging Neighbourhood Plans and should not unduly restrict sustainable sites coming forward in the future over the Plan period.

### **Strategic Policy 5: Mixed use developments incorporating housing, employment and community facilities**

CCE endorses EDDC's objective of supporting business investment and job creation opportunities within East Devon. CCE has a record of delivering employment facilities in East Devon, including the Exeter Gateway Distribution facility to the north of the site, at which Lidl and Amazon distribution centres already operating.

It is noted that Strategic Policy 5 requires development in the countryside on allocated or windfall sites with 25 homes or more to include at least 0.1 hectares of employment land for each 25 homes proposed. CCE requests that the Council maintains flexibility and that the policy is implemented on a site-by-site basis so that site specific circumstances, such as location and viability, can be taken into account when determining appropriate land uses.

### **Strategic Policy 7: Development beyond settlement boundaries**

CCE welcomes the flexibility proposed within Strategic Policy 7 to permit development outside of settlement boundaries where it is in accordance with specific Local or Neighbourhood Plan policies which explicitly permits such development, where it would not harm the distinctive landscape, amenity and environmental qualities of the area within which it is located. This approach will assist in bringing forward appropriate development on sites within rural Neighbourhood Plan areas that otherwise would be opposed within the Local Plan.

### **Strategic Policy 8: Development of a second new town east of Exeter**

CCE recognises that long-term strategic developments can be crucial to meeting housing requirements in the district, along with providing key infrastructure and facilities for existing and new residents. In this context, CCE endorses Strategic Policy 8 and the development of a second new town east of Exeter. In particular, CCE supports 'Option 1' as the preferred option for the new settlement, south of Clyst Honiton between the A30 and the A3052. It is considered that this site would benefit from good access via the A30; benefits from proximity to Exeter Airport and Exeter Gateway Distribution facility to promote commercial uses; and can be made acceptable in terms of landscape, heritage and ecology via appropriate masterplanning. The site would provide the opportunity to deliver infrastructure to support other development within the local area, particularly complementing the existing Clyst Valley Regional Park and providing opportunity for expansion.

## **Strategic Policy 28: Net zero carbon development**

CCE welcomes EDDC's objective to tackle the climate emergency and ensure all new development moves towards delivering net-zero carbon emissions by 2040. CCE is also committed to seeking to achieve net zero carbon across its portfolio by 2050 and is exploring opportunities to deliver this. The industry has taken time to adjust to these higher standards and is continuing to develop new solutions and responses. As such, it is considered that it would be appropriate to build a transition period to 2040 into the policy consistent with the overarching objective.

Furthermore, CCE supports the aspirations for new homes to be future proofed to avoid temperature discomfort and maximise opportunities for renewable energy. In this respect, it is important that the policy is flexible to allow the use of new low carbon and renewable energy technologies that emerge over the plan period so that developments can incorporate the latest expertise, whilst also taking account of site specific circumstances. This flexibility should also reflect that strategic developments or outline planning applications may not be in a position to fix renewable energy strategies at the point of submission due to long build out periods or where a housebuilder/developer is not yet on board.

## **Policy 40: Affordable housing**

CCE supports Policy 40 and the requirement of delivering at least 30% of housing as affordable for new residential developments, where viable. CCE has a strong record of delivering affordable housing across its residential development sites.

## **Policy 87: Biodiversity net gain**

CCE endorses EDDC's objective of protecting and enhancing the natural environment and supporting an increase in biodiversity, and has a record of delivering biodiversity net gain (BNG) across its development sites. However, the requirement set out in Policy 87 for development proposals to result in a biodiversity net gain of at least 20% could impact the deliverability of new development and restrict sustainable development from coming forward.

Therefore, CCE request that Policy 87 is amended to 'at least 10%' BNG, in line with emerging national requirements as set out in the Environment Act 201. This will ensure that vital new development continues to come forward in the district. Nonetheless, CCE strongly supports that the Policy allows for off-site habitats to be created or enhanced to provide BNG for new developments, ensuring flexibility for developers.

## **Summary**

CCE welcomes the opportunity to comment on the emerging Local Plan. In short, CCE supports the focus for new development in the western part of the District and specifically endorses the identification of Option 1 as the preferred option for the new settlement under Strategic Policy 28.

We trust that these representations are clear and will assist in the finalisation of the emerging Local Plan. Please do not hesitate to contact either me or my colleague Pauline Roberts should you require clarification on any points made. We would also be grateful if you would continue to keep us informed on progress on the development of the emerging Local Plan and any other planning documents that are prepared by the local planning authority.

**LICHFIELDS**

Yours faithfully



**Caitlin Newham**  
Planner

## **Annex 1: Site location plan**



Figure 1 - Clyst Honiton Site Location Plan