



EAST DEVON LOCAL PLAN 2020 TO 2040  
REPRESENTATION ON THE PREFERRED OPTIONS REG.18  
CONSULTATION DRAFT PLAN

On behalf of

Mr Lisle Burrough

Dated 12 January 2023

Stags Planning Services  
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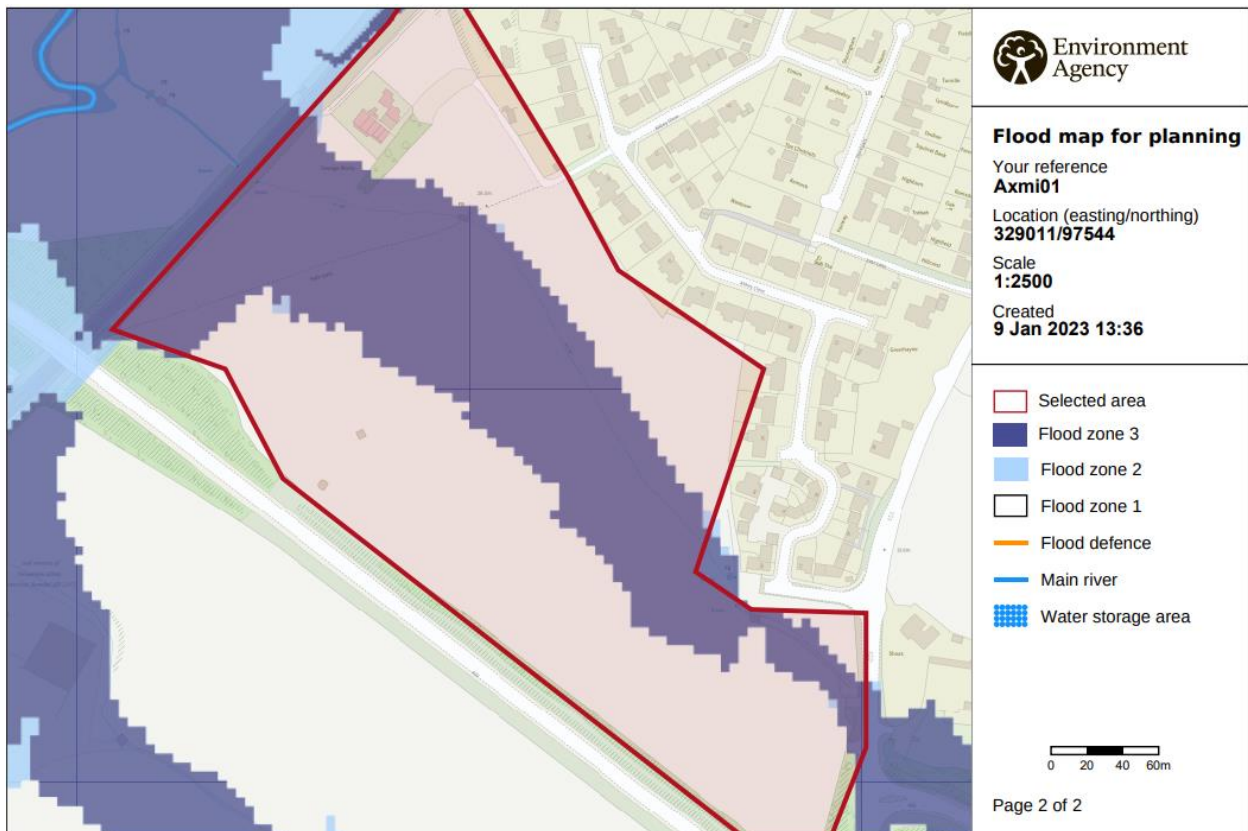
APPENDIX I – SITE CONCEPT PLAN

## 1.0 INTRODUCTION

- 1.1 This Local Plan Representation has been prepared on behalf of Mr Lisle Burrough in support of the allocation of Land west of Musbury Road (part of Axmi\_01) known as 'Horslears' for mixed uses (employment and housing) in the emerging East Devon Local Plan.
- 1.2 At present, within the autumn 2022 consultation draft of the East Devon Local Plan, the southern part of this site that lies outside of the floodplain is allocated for 2 hectares of employment land. This is a preferred allocation for employment use only.
- 1.3 This representation outlines the key benefits and opportunities associated with this land and further sets out why it should be progress as an allocation within the emerging East Devon Local Plan.

## 2.0 THE SITE

- 2.1 The land west of Musbury Road is owned by the Burrough Family and totals approximately 7.7 hectares. It is agricultural land which, in recent years has generally been in use for grazing and the production of silage, though in the past the land has also been used for growing crops. The topography of the site is gently sloping.
- 2.2 The land has the benefit of three access points, one from Abbey Close (to the north) and two from the A358 (to the east). All of these access points are of a good quality. There is a further access to the field alongside the railway line connecting it with agricultural land to the south of the A35.
- 2.3 A small stream flows through the centre of the land towards the River Axe, west of the site. The stream flows through a deep gully and Mr Lisle Burrough, on whose behalf this representation is made, is unaware of any instance of this stream over topping its banks in the last 70 years. There are however areas of Flood Zone 2 and 3 associated with this stream. An excerpt from the Environment Agency flood map for planning is included below as Figure 1 to illustrate this.



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Figure 1 – Environment Agency Flood Map for Planning

- 2.4 An existing footpath (Axminster Footpath 63) crosses the land from the northern Abbey Close entrance to the south western corner of the field where it leads towards Lower Abbey Farm. The location is shown in Figure 2 below.

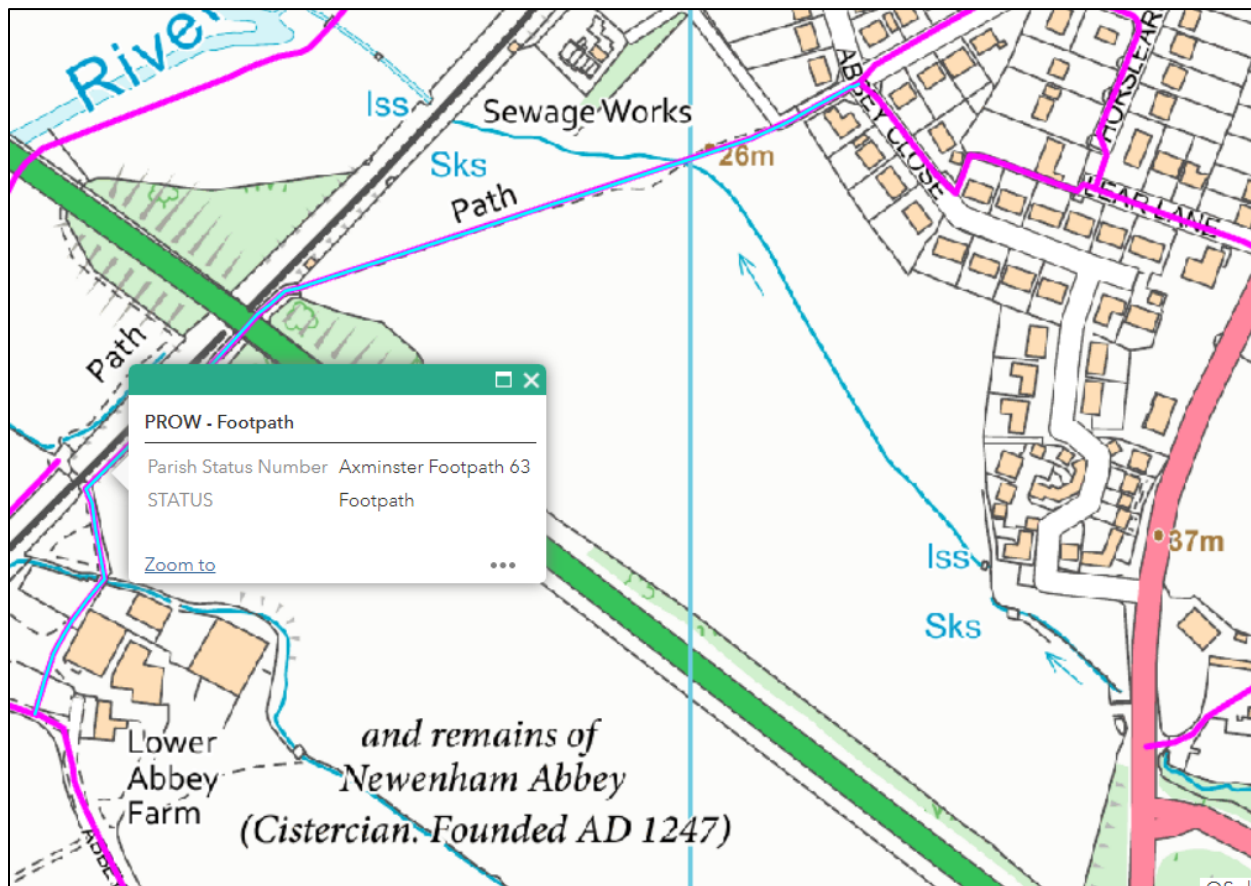


Figure 2 - Existing Footpath

- 2.5 There are a number of heritage constraints within both the site itself and wider local area. Within the site, this includes two WWII pillboxes which formed part of the Axminster fortified area on the Second World War Taunton Stop Line. To the south west is a Scheduled Monument associated with the remains of Newenham Abbey, however this is separated from the site by the A35.
- 2.6 The boundary of the East Devon Area of Outstanding Natural Beauty (AONB) runs through the centre of the site, with much of the site falling within the AONB. This segment of AONB is disconnected from the wider designation which extends to the south and west on the opposite side of the A35. It is understood, that this boundary was set out prior to development of the A35 and as such is arguably now outdated.
- 2.7 Other constraints include a South West Water sewage pumping station in the north western corner of the site.

### 3.0 EMPLOYMENT

- 3.1 At present, the southern part of Horslears is allocated for 2 hectares of employment land within the autumn 2022 consultation draft of the East Devon Local Plan.
- 3.2 A concept plan has been produced and is included as Appendix I to this representation. This plan illustrates how the site may be progressed to provide a high-quality, mixed-use development. The concept plan shows a minimum of approximately 6,000 square metres of employment floor space being deliverable, with significantly more being possible if all or some of the units are delivered as two or more storey.
- 3.3 The plan demonstrates that adequate provision can easily be made for surface water attenuation, onward pedestrian links to the town and how the non-designated heritage assets can be incorporated in to the site's development.
- 3.4 The site benefits from excellent vehicular access to the strategic transport network via the A358 which runs directly adjacent to the east of the land. This access already provides excellent visibility on to a section of the A358 with straight alignment. There is also space and scope to improve this further as required. Dedicated pedestrian links to the residential areas north of the site can be provided through Abbey Close.
- 3.5 Overall, we concur that this is a suitable area for allocation for employment development. It is envisaged that a majority of traffic accessing employment sites at Axminster (other than that originating from Axminster itself) will originate from the A35. As such, in comparison to other potential employment sites both within and around Axminster, this site has the benefit that all traffic originating from the A35 will not have to pass through the centre of Axminster. This will have great benefits in terms of air quality and road safety for the town as a whole.

## 4.0 HOUSING

- 4.1 The draft local plan allocates this site for employment only. Within the Sustainability Appraisal that accompanies the East Devon Local Plan consultation draft, Axmi\_01 is stated as having significant negative impact in terms of housing delivery as it is proposed for employment only.
- 4.2 In spite of this, it is our considered opinion that the site is easily capable of delivering in the region of 10-15 dwellings alongside the envisaged two hectares of employment. The concept plan provided at Appendix I shows how, taking account of all environmental constraints, this number of dwellings could be accommodated within the northern part of the site at a density which is directly comparable with the existing housing to the north (the plan shows 12no. dwellings consisting of 2,3- and 4-bedroom properties).
- 4.3 The northern part of the site is directly adjacent to the existing local plan settlement boundary and benefits from direct access to Abbey Close. As can be seen from the concept plan, it falls outside of the area at risk from flooding and remains in excess of 50 metres from the sewage pumping station at its closest point.
- 4.4 The current strategy for the delivery of housing in the emerging East Devon Local Plan is for a large proportion of the required housing numbers to be located at the western end of the district, in particular around Cranbrook and through the provision of a new settlement. Beyond this, some 5,500 houses are envisaged as being delivered at the principle and main centres, of which Axminster is one.
- 4.5 Relying on a new town and major settlement expansion for the delivery of a large proportion of the District's required housing is not without its risks. Indeed, East Devon District Council are currently unable to demonstrate a 5-year housing land supply largely on the basis of the behind schedule delivery of new housing at Cranbrook.
- 4.6 The land west of Musbury Road provides an obvious opportunity for a mixed-use allocation and it is suggested that the northern portion of the land should be allocated for 10-15 dwellings in addition to the southern portion being allocated as employment land. This is a reasonably significant number of dwellings and will contribute to the housing delivery targets as such. It is a highly sustainable location, with one of the district's largest towns immediately to the north and proposed future employment to the south, within easy walking distance.
- 4.7 Given that the location of the northern part of this site directly adjoins the settlement boundary, there will undoubtedly be future pressure for its residential development irrespective of whether it is allocated within the emerging East Devon Local Plan. However, allocation of this portion of the site for residential dwellings will allow for holistic development of the site in a coherent manner, which is unarguably preferable to the piecemeal alternative.

## 5.0 ENVIRONMENTAL OPPORTUNITIES

- 5.1 Allocating the site for a mix of employment and residential purposes will add further scope to deliver additional public benefits.
- 5.2 It is envisaged that these public benefits could, for example, include: flood mitigation; increased public access; safeguarding of the historic environment; noise mitigation from the A35 for existing dwellings; and biodiversity benefits.
- 5.3 Specifically, space has been provided within the concept plan for adequate surface water drainage to mitigate for the development. Additionally, works could be undertaken to increase flood storage within the central portion of the site. This central area could be used for public access, with a range of new footpaths allowing for circular walks as well as pedestrian access to the employment area. Further to this, landscape planting will both provide mitigation for any visual impacts arising from the development of the employment area and also important habitat mitigation to provide for a net gain in biodiversity.
- 5.4 With regards to the on-site heritage assets, the concept layout has been designed around these, in order to both ensure their retention and also better reveal their significance. It is also considered that development of this site may provide an opportunity to safeguard these assets from falling in to disrepair.



## 6.0 CONCLUSION

- 6.1 As set out above, it is considered that Horslears (land west of Musbury Road – Axmi\_01), is a highly sustainable location that is suitable for an allocation for a mix of employment and residential uses. It is our view that its allocation as such will allow for a holistic approach to development of the site, which will in turn provide the greatest opportunity for high quality planning outcomes.
- 6.2 It is therefore concluded that the land should be allocated in the emerging East Devon Local Plan for 2 hectares of employment land and 10-15 residential dwellings.

# Appendix 1 – Site Concept Plan

