



Axminster Neighbourhood Plan Steering Group
(Commissioned by Axminster Town Council)

Response to East Devon District Council on their Consultation Draft Local Plan, 2020-2040

From: Axminster Neighbourhood Plan Steering Group.

Date: 13th January 2023

Axminster Neighbourhood Plan Steering Group have considered the Consultation Draft Local Plan (CDLP) and request that EDDC accept this as our formal response as part of the on-going consultation, ending on January 15th, 2023. The Group wishes to examine elements of the Plan that are more extensive and far reaching than the on-line feedback facility allows.

Strategic development in both housing and industry.

Firstly, we wish to acknowledge that we understand and accept the need for the building of housing and employment facilities in order to support the future growth of Axminster. In the paragraph “Review of proposed sites” you will see our detailed comments of both agreement and concern.

Whilst we understand that EDDC can only firmly propose sites that have been brought forward by the land owner or are owned by EDDC, we feel that the CDLP disproportionately prioritises land availability over considerations of how the resultant sites fit in with an overall strategic approach to both Axminster and to the whole EDDC area. We do not see a genuinely strategic approach where your proposals for growth show a much more rigorous assessment not just of the simple existence of social, educational and health and well-being facilities, and industrial and transport infrastructure, but also taking full account of the presence or absence of spare capacity and scope and funding for expansion.

Whereas we can understand EDDC’s strategic approach to the promotion of new settlements, we struggle to detect it in the way that you are treating the established towns, and in particular Axminster. Given that Neighbourhood and Local Plans are required to agree on such matters, this is making our task (of developing a Neighbourhood Plan) much harder than we might have hoped. The reality of what can and cannot be obtained through site availability, infrastructure constraints, physical boundaries, AONB, etc. would then drive the plan, taking proper account of why the housing allocations are what they are as opposed to the simple premise that they are the strategic intent of EDDC.

Disproportionate allocation of housing

Within your emerging LP document, your EDDC’s Strategic Policy - Spatial Strategy states that: *New development will be directed towards the most sustainable locations in East Devon, consistent with the spatial strategy to:*

Promote significant development at the Principal Centre of Exmouth and the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth to serve their own needs and that of the wider surrounding areas.

What we find hard to understand is how EDDC will be serving the needs of Axminster and its surrounding communities by allocating such a disproportionate share of the District's new housing here without any new supporting infrastructure.

Simply basing housing allocations on sites which owners have offered does not equate to strategic town and country planning. The outcome is that many of your proposals for new residential development in Axminster fly directly in the face of section 3.2 of your own plan.

We would draw your attention to some basic statistics.

- Over the 40 years between the censuses of 1971 and 2011 the population of the parish of Axminster grew from 4,517 to 6,557: a growth of 45%, with the growth within the town itself being appreciably higher.
- Between the census of 2011 and the Valuation Office's returns for 2020 (linked to Council Tax data), the number of dwellings in the parish of Axminster grew from 3,215 (of which 2,840 were in the town) to 3,768. The CDLP proposes to add a further 1,370 dwellings between 2020 and 2040, raising the parish total to 5,138. This represents a growth of 60% over 29 years, with the growth within the town itself being appreciably higher.
- In combination, these figures show that the CDLP suggests a growth within the town of Axminster of well over 130% in 70 years, with almost all of that growth coming since the Axminster by-pass was opened in 1990, since when no significant improvements have been made to the town's road infrastructure.

EDDC Local Plan 2016 and HELAA documentation (specifically November 2022)

This documentation contains information regarding sites in Axminster that have neither been developed nor have planning applications but have not been brought forward into the 2020-2040 emerging Local Plan.

Specifically, we refer to the agenda for the 1 November 2022 meeting of the Strategic Planning Committee, Appendix F(iii) - Sites submitted in response to the 2022 East Devon Call for Sites attached to 'HELAA Committee Report 2022, Item 57, with the resulting file listed as 011122bpaxminster.pdf. Many of these sites would allay the concerns mentioned in the paragraph below concerning accessibility and density. We would urge EDDC to reconsider the current site proposals with these sites (Axmi_15, Axmi_16, Axmi_17, Axmi_18, Axmi_19, Axmi_20, Axmi_22) in mind before considering the sites with topography and access issues contained within the current emerging Plan submission.

The extant Local Plan 2006 to 2026 mentions the "Webster's" site in some detail within the Axminster Section (Strategy 20) and makes reference to the need to deliver public realm improvements and address traffic congestion problems in the town. We are at a loss to understand why this has not been carried forward as a consideration into the emerging Local Plan 2020-2040.

Infrastructure, Accessibility and Density

We do not feel that EDDC have considered the effect of the above elements in sufficient detail regarding the proposed sites in Axminster.

Infrastructure

As mentioned above, the 2020-2026 Local Plan refers to the need to assess traffic congestion with previous analyses having identified a critical need for new infrastructure as a pre-requisite for expanding Axminster's housing stock. A proposal to deliver a North-South Relief Road and 800+ houses foundered when grant funding for the road was withdrawn. Since then, several hundred more houses have been built or approved. The present CDLP proposes to add a further 1,050 dwellings without any mention whatsoever of new infrastructure.

It is not just the local roads which are overloaded. The local healthcare and educational facilities are struggling to cope with the current population, let alone a major expansion.

Accessibility

We do not believe that assessing a site's accessibility simply by using the "<1,600m as the crow flies from the town centre" criteria is realistic without considering the existing infrastructure and topography. In Axminster, as in many other Devon towns, considerations of slope and pavement quality (including width) should be considered, alongside the actual walking distance, taking particular account of the homeward walk.

Density

We believe that housing densities should be both planned and delivered in line with the Government's 2021 'National Model Design Codes'. The guidance describes four typical urban settings for which target densities are proposed, as follows: (1) town or city centres @ >120 dph; (2) urban neighbourhoods @ >60 to 120 dph; (3) suburbs @ 40 to 60 dph; and (4) outer suburbs @ 20 to 40 dph. We feel that the default target density for Axminster should be 40 dwellings per ha (dph), and that any proposal offering less than 30 dph should not even be registered by EDDC, as a matter of policy.

Review of proposed sites

- GH/ED/79 We agree that this site can be delivered without the proposed N-S Relief Road, with vehicular access via Lyme Road and multiple pedestrian access points. It is still the subject of a full Planning Application (19/0150/MFUL), including 104 houses.
Although we do not like several aspects of the application as lodged, the principle of development on this site is not challenged.
- GH/ED/80a Much of this site is very steep. Providing effective flood mitigation from 200 new houses and employment land to protect a stream with a history of increasingly serious flooding would be extremely challenging. Inadequate mitigation would make a bad situation much worse.
We regard vehicular access from Sector Lane (particularly for employment land) as unacceptable, and access via GH/ED/79 (involving the closure of Sector Lane, as per the N-S relief road scheme) as impractical. If the development spreads down the slope towards the stream, pedestrian and cycle access will also become challenging.
- GH/ED/82 We agree that this site can be delivered without the proposed N-S Relief Road, with vehicular access from Chard Road. However, it will inevitably contribute to existing HGV pressures on Weycroft Bridge and the town centre.

Although the site itself is relatively flat, we are also concerned about the inevitable impacts of further development on the adjacent stream. Any further narrowing of the gap between Axminster and Weycroft Hall (Grade I listed) will need to be very carefully managed.

GH/ED/83 We regard this site as two distinct parts: N and S of Tiger Way. We understand the logic of including the land S of Tiger Way, but we believe that EDDC should not allow any more housing on the N side of Axminster without including much better food retail provision. This would help to relieve town centre congestion, and serve many existing residents better. We believe this should take priority over employment use in this location in the absence of another dedicated retail site. We regard the N side of Tiger Way as less suitable for development, not least because of its distance from the town centre.

Axmi_01a We agree that this site is well suited to employment use, given its excellent connection to the A35 by-pass, via the existing interchange. We believe that the constraints are capable of being satisfactorily addressed, and that it will reduce traffic noise levels at existing housing.

Axmi_02 & 08 We agree that these can helpfully be considered as a combined site. It lies beyond a long-established and clear natural boundary (the S edge of Woodbury Park / Athelstan Close). If developed for residential use it would inevitably constitute a 'bridgehead' for further housing. There is currently no safe pedestrian access to this site via Musbury Road (a constraint which cannot easily be overcome), and access from the town centre via Wyke Lane involves some steep slopes as well as a considerable distance. Taken together, these constraints mean that few residents would be likely to walk into the town centre. Although not technically part of any AONB, and despite the existence of the A35 by-pass, this combined site is (1) attractive countryside in its own right; (2) clearly visible from large swathes of the East Devon AONB in a way that the town of Axminster is not at present; (3) good quality agricultural land; and (4) in an area that is used for recreational walking by a large number of residents of the S half of Axminster. The amount of environmental mitigation which would be essential to prevent its effects being adjudged as 'significantly adverse' would inevitably erode the number of houses which could be delivered.

Axmi_07 We welcome the inclusion of this site, which is well-connected to the town centre, and could provide much improved pedestrian and cycle access from Gamberlake Cross. As Axminster grows, much of this site will become increasingly appropriate for higher-density residential rather than employment use, and we would like to see significant parts of this site (plus all or parts of adjacent ones, if possible) allocated to high density housing (terraced housing or flats). If / when the main carpet factory building becomes available, consideration should be given to delivering a road connection from the by-pass slip road to Axminster station, alongside further high-density housing.

- Axmi_09 All of the considerations which apply to Sites Axmi_02 & 08 also apply to Axmi_09, which although technically not part of the East Devon AONB is indistinguishable from it in landscape quality terms, and very visible from significant parts of both of the local AONBs.
Because of its distance from the town centre, Axmi-09 would be a totally car-dependant satellite suburb. We think it likely that once in their cars, residents heading for a supermarket will go to Seaton rather than Axminster. We would therefore simply be trading open countryside for housing which should be elsewhere.
It would be a different matter if this site (or Sites Axmi_02 & 08) was also to provide new facilities (e.g. a GP surgery, educational facilities or a retail food outlet). Even so, that would represent a very substantial change to the character of Axminster.
Of all of the sites in the Consultation Draft Local Plan, this is the one which appears to be least defensible in planning policy terms, and can be expected to attract the strongest opposition.
- Axmi_10 Whilst regretting the loss of any facilities on the hospital site, we know that this site is being marketed for residential use.
Although there is a case for building 4-5 bungalows (as in Hilary Gardens and Latches Walk) with small gardens, given the proximity to the town centre we agree that a significantly higher density development (town houses or even flats, as at nearby Poplar Mount) is preferable. With good architecture, a 3-4 storey building with excellent long views might be acceptable.
- Axmi_11a Of all the sites in the CDLP which are able to accommodate over 10 dwellings, this is the one with the best access to the town centre. If combined with Axmi_12 it would be accessible from both Lyme Close and Lyme Road.
It also offers the opportunity to build in much-needed flood mitigation measures with the potential to relieve flash flooding pressure on the Purzebrook, which has repeatedly flooded downstream properties on Musbury Road.
We would support the provision of high-density affordable housing on this site.