

Evidence submitted to LDF Panel meeting 2nd August 2011

Includes:

Current submission (below)

Appendix 1 – evidence relating to specific sections of the issues & Options report

Appendix 2 – specific sections of the 182 page PDF we refer to have been highlighted in yellow – starting from P8

Appendix 3 – National Trust comments (relevant to Broadclyst, as large land areas in our parish are NT owned)

Broadclyst Parish Council wishes to emphasise again its concerns that DCC recommendations to be guided by a Master Development Plan (5.4) have been ignored and the pace that the LDF is being pushed through. If this part of the planning process is shown to be flawed, it could lead to many planning applications being contested through the courts, which could be construed as inappropriate use of public money.

We are bearing a high percentage of development on good quality food-producing land and can see little evidence of the council's effort to seek development of brown field sites in preference to agricultural land. This depletes the future UK food security + introduces a long corridor of concrete foundations to the ribbon development planned East of Exeter, in an area where run-off already causes flooding.

In addition to the detailed evidence submitted 29th November 2010, we would add the following strong objections to the recent amendments to outline planning for the Inter Modal Freight Terminal:

- traffic restrictions have been removed, allowing potential 24 hour HGV movements
- removing the constraint to ensure rail links were inherent; it is now being taken forward as a haulage depot, not intermodal
- a large area of concrete warehousing will only provide an estimated 120 low-skilled jobs, whilst destroying much agricultural land and exacerbating water run-off problems elsewhere.

We re-submit our detailed comments of 29 November 2010:

Following a parish consultation meeting 4th November 2010 and collation of responses from our parishioners, Broadclyst Parish Council has considered the broad intentions set out in the LDF Core Strategy Preferred Approach and set out comments and proposals below.

We have not commented on Cranbrook Area 4 and Science Park Area 8, as these proposals already have Outline Planning Permission. We recognise the need to consider the other preferred options in the light of all the additional development within Exeter city boundaries.

Ideally a Master Development Plan should take account of infrastructure for the combined effect of all these proposals. Exeter city council recently deferred decision on the Master Plan, so let's ensure that the final document does its job. For clarity, we are submitting both a letter, stating the summary of our comments and an appendix which relates specific concerns to each section of the document (some of these concerns were duplicated many times by our parishioners).

Two Strong recommendations

1. The Master Plan must be finalised before decisions involving highways infrastructure concerns are addressed. Indeed, we must take a holistic view, to allow for developments across Exeter City & EDDC boundaries. **
2. Ensure that the Localism Bill is incorporated in this LDF document: *"There are, however, some significant flaws in the planning system as it stands. Planning does not give members of the public enough influence over decisions that make a big difference to their lives. Too often, power is exercised by people who are not directly affected by the decisions they are taking. ... The Localism Bill contains proposals to make the planning system clearer, more democratic, and more effective. ... ensuring planning decisions are made by people who are democratically accountable and through genuine collaboration with local people "* - Govt update June 2011.

Transport Infrastructure

This West End location was chosen over other areas because of existing transport network links: proximity to M5, A30, rail links and the airport. Should all the preferred options go ahead, we maintain that Transport Infrastructure won't be able to cope with actual use, either during early stages of development or when additional infrastructure is operational.

Our key objective is to develop housing in this area at a manageable scale to compliment the employment expansion. In addition, we recommend that optional housing development and light industrial units are spread more evenly across East Devon, reducing the intensity of development in areas 1, 2, 3 & 7 and the associated traffic movements. Alternative areas could be developed with less pressure if the planned bypasses go ahead for Axminster and Kingskerswell; we believe Crediton bypass is already adequate to take more development than is proposed. Employment and housing development could be increased in these areas, absorbing the extra health & education requirements during the early years.

Ensure Highways Assessments are current before this document is accepted and counts are carried out during school terms at peak times to get realistic results. Traffic assessments must take into account later development phases to e.g. areas 2, 3 and 7.

Public Transport plans won't necessarily limit the car use as planned, particularly in bad weather and Cycle paths may not be used by commuters where there is a more direct route by road.

Many of our narrow rural roads will suffer further congestion and excess wear to road surfaces that are not designed for heavy use. Station Road, Broadclyst, already experiences regular HGV movements on an unsuitable road and would inevitably be used as a route from Cranbrook in the first phase to Broadclyst community facilities, exacerbating the problems already experienced at peak times.

** If the land areas are developed in EDDC Areas 1 & 2 and the Old Quarry development Pinhoe, either side of the Exeter/E Devon boundary go ahead: 450 + 350 homes will be generating traffic from the West Clyst end of Pinhoe which will meet traffic from the Old Quarry development of 380 homes converging on the mini double roundabout system at Pinhoe; this is in addition to the existing residential and commercial traffic on the B3181.

A Transport Plan must be in place for construction traffic, to minimise the impact which will be felt for some years.

Whimble & Feniton must keep their railway stations open and there is concern that Cranbrook Station car park will suffer flooding.

Proposed future extension of housing Allocations: Areas 1, 2, 3 & 7 **[beyond Cranbrook area 4]**

We object to the scale of proposed housing development concentrated in this area – statistics have not been provided to justify this much additional housing development for the employment opportunities planned. The East Devon development must take account of future housing developments planned within Exeter boundaries and the reality that most homes will require 2 job opportunities per household, not one. A significant area of Broadclyst rural parish is included in the Exeter Growth Point major development plan but also classed as a hub village and expected to absorb another 50 dwellings. This will lead to our present rural nature being changed to Urban sprawl!

We would ask EDDC Growth Point Team to supply the justification for this scale of housing provision, as there would seem to be a massive shortfall of jobs if so many houses are built.

We would hope that lessons can be learned from the recent Irish problem, where unnecessary housing developments have been abandoned before completion. Losing prime agricultural land to this level of residential development is short-sighted, when there is pressure to increase (not diminish) local food sources. Once developed, this land can never be reclaimed.

Area 3

We accept that areas which will have least impact on local transport & social infrastructure should take priority, for the greater good of the area. However, although Green Area 3 would seem a logical future extension of the Cranbrook Area 4, we oppose the Red Area 3 because:

- a) power lines will cause problem with siting housing
- b) there may be restrictions to housing so close to the airport – noise & safety
- c) more development on floodplain

It would also seem reasonable to reduce the density of housing, as financial forecasts indicate that there won't be mortgages available to take up all these properties planned.

Affordable housing

We have strong reservations that local people will be catered for. Despite intentions, 20% (rather than 40%) affordable homes are more likely long-term and "affordable" may still not be within the means of local wage earners. Bringing major employers into the area has already pushed up housing prices and we believe will also bring in work force from outside (i.e. out of county).

Employment

It is recognised that this area was chosen as a growth point for major development because of its proximity to Exeter. However, there is a mismatch between employment opportunities and housing provision planned; therefore people will still travel outside of the area for work.

We object to light industry included in the Areas 1 & 2, as there are existing areas of Pinhoe Industrial Estate, Sowton, Pyne Hill and Digby sites relatively nearby and underused. Also, within Exeter City, extension of the Marsh Barton trading estate planned for has not yet been fully developed.

If nearby light employment is planned for new developments in Areas 1, 2, & 7 (to reduce car miles) why is so much development still located so close to Exeter? This rationale should lead to consideration of expanding Sidmouth/Honiton etc.

Flood Plain

We are assured that the Cranbrook Area 4 development itself is safe-guarded from flooding through the integral technology which will be used. However technically advanced the foundations will be, development of agricultural land on this scale will inevitably increase flooding downstream from Cranbrook.

Technical reports available with respect to use of the floodplain for development were based on the original Cranbrook Area 4 and have not taken into account the additional housing areas 3. We strongly recommend the need for thorough technical assessments for developing land areas 4 & 3, taking into account the frequency and complex nature of flooding events which already occur in our parishes. Nationally, it is expected that flooding events will become more commonplace unless preventative measures are taken.

Community Infrastructure

We accept that ultimately Cranbrook will dominate, overshadowing our individual parish identity but ask that with this forced urbanisation, the retained Green Wedges will not be lost to extend development later, especially south of the old A30.

We strongly urge EDDC to consider adequate provision of the following for the transition years:

- a) **Extra stresses from Exeter & E Devon Growth:** Extra workload will be put upon our Parish; then when Cranbrook has its own Town Council, our rural parish will suffer erosion of our tax base and local community facilities. Cranbrook S106 Funding will not secure rural facilities for existing settlements, facing loss of facilities when Cranbrook is established. All this during a period when town & parish councils are expected to consider taking over provision of extra local services from County & District (when The Big Society plans are passed through parliament).
- b) **Local health care facilities:** until Cranbrook, Pinhoe & Blackhorse can provide independent or additional GP surgeries & dentists, perhaps mobile or satellite health provision could be made in the early stages.
- c) **General hospital / A & E / maternity facilities:** serious attention must be given to how existing Exeter facilities can be expected to cope with the huge growth in people needing them from new

developments in both Exeter & Cranbrook; especially in light of the fact that most of these health services are working at (or close to) capacity already. A solution must be sought now. Could this include development for a community hospital in some of the allocation areas?

- d) **Education:** Local schools and governors were not consulted and there is evidence that existing pupil places at both primary and secondary levels will not be able to take the influx until new schools are built. Many of our local schools are oversubscribed already. The school proposed for Area 1 (on the Old Park Farm site) is not due to be built until Phase V, if at all. What assessment has been done to calculate the increase in traffic as a result of families driving their children to schools further away?
- e) Parking in Pinhoe and Broadclyst will not absorb extra influx for local facilities, especially at school peak times; there is little prospect of expanding parking facilities due to existing urban constraints.

Exeter and local rural services are not geared up to the level of growth planned. Exminster, Axminster, Tiverton, Honiton and Exmouth should be developed more than is planned because existing infrastructure is better suited to cope.

Major employment sites (Sky Park, Science Park)

Overall, the Broadclyst Parish Council accepts the Preferred Approach to these employment sites, as long as adequate infrastructure is in place.

Denise Hammond
Clerk to Broadclyst Parish Council

2 Appendices attached