

Filtered Data Export

Full name: Claire Alers-Hankey

Organisation (where relevant): Greenslade Taylor Hunt

Other party name (if relevant): Waddeton Park Ltd

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL05

3. Do you consider that this part of the Our Outstanding Landscape chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Our Outstanding Landscape chapter is not sound. Please be as precise as possible.: The proposed green wedge is far too extensive, including vast swathes of land that performs no function in terms of maintaining the separation and identity of settlements.

The stated purpose of the green wedge designation is to prevent the coalescence of settlements and maintain their separate identities. An Officer report to the Strategic Planning Committee on 13th February 2024 advised that green wedges “are not intended to cover large swathes of land, or completely fill the space between settlements, instead they are intended to protect features or areas that are key to preventing coalescence or loss of identity”. The report goes on to explain that, in other locations outside of settlement boundaries or site allocations, “the countryside protection policies will continue to apply and there will continue to be a presumption against development in these areas”. The report then reminds the Strategic Planning Committee of its own resolution on 11th January 2022 that “Extensive areas of Green Wedge that go beyond the area needed to achieve this aim would unnecessarily restrict development that would otherwise be acceptable”.

The report also presented green wedge assessments to the Strategic Planning Committee. These were focussed on identifying and protecting the features that are key to safeguarding character and identity and preventing coalescence. A robust methodology was applied to these assessments and this can be seen in Appendix 1 of the report to the Strategic Planning Committee on 13th February 2024. The assessments concluded that, in most cases, the green wedge designations in the current Local Plan should be scaled back to more accurately reflect their desired function and in line with the Committee’s resolution on 11th January 2022 (see 2.2.2).

The assessment concluded that the East of Exeter Green Wedge designation should be withdrawn and replaced with a more focussed green wedge on the west side of Clyst St Mary. The remainder of the East of Exeter Green Wedge was deemed to “not meet the designation criteria because it does not separate two or more settlements”. A review of the detailed assessment undertaken by Officers is helpful in understanding how this conclusion was drawn and the following extracts from the assessment are considered particularly relevant:

“Overall, the area of search is characterized by sweeping open countryside, though with substantial developed areas within, and the River Clyst, which meanders through the area from north to south, primarily in the central portion. This creates a diverse landscape with a blend of rivers, vegetation cover, and manicured lawns. The sense of separation is pronounced, enhanced by the mature trees surrounding Sowton village, the intervening distance, and the major roads (A30, M5, and A376), which play a significant role in defining the area's distinct character.”

“Low visibility exists between settlements due to the distance and the intervening motorway and main roads.”

“The three main sub-areas within the area of search, and the perception and actual distances between them, is such that they have a distinct sense of separation from one another.”

“The proposed green wedge is located on the western side of Clyst St. Mary village next to the river Clyst and alongside Sidmouth Road (A376). On account of the substantial size of the area of search and the real and perceived existing sense of separation of settlements there are no alternative options identified.”

Despite the robust assessment process undertaken by Officers, Members of the Strategic Planning Committee resolved not to agree with the proposed recommendation to reduce the extent of the green wedges (including the East of Exeter Green Wedge). No robust reasons were given for this decision, albeit reference is made in the Minutes of the meeting that the methodology did not address “the aspirations of residents”.

A report to the Strategic Planning Committee on 30th April 2024 makes reference to a workshop between Officers and Members where the topic of green wedges was discussed. In that meeting Members stressed the length of time that existing green wedges have been in place and the level of public support and public understanding that they enjoy. It was also highlighted that green wedges help establish and positively shape a sense of place and that an intrinsic sense of separation of settlements is a critical concern in their definition. None of these claims are supported by robust evidence, however Officers were ultimately left with the clear impression (as noted in the Committee report) that Members wished to “retain the existing green wedges as much as possible”.

As a consequence, the East of Exeter Green Wedge (and other green wedges) presented in the consultation document has reverted more or less to its previous expansive form. No robust justification for this approach is provided within the consultation document or within the report to the Strategic Planning Committee on 30th April 2024. It can therefore be reasonably concluded that this decision simply reflects a preference among Members to retain expansive green wedge designations, rather than being grounded in any robust assessment or policy basis.

The Committee report rightly warns Members that planning policies must be evidence based and accord with national policy and guidance as they will ultimately be scrutinised at Examination. This is particularly significant in the case of policies relating to green wedges, as this is not a form of designation that is endorsed by the National Planning Policy Framework (NPPF) or Planning Practice Guidance (PPG). This advice is of course correct and highlights the clear shortcomings of the approach now presented within the consultation document.

To conclude, a robust assessment undertaken by Officers advised that the current green wedge policy is not fit for purpose and that the policy should be amended to reduce the extent of green wedges to those areas that provide a genuine function in maintaining the separation and identity of settlements. The findings of that assessment have been ignored, with Members opting to retain expansive green wedges against the advice of Officers and without robust justification.

Waddeton Park Ltd maintains its objection to the extent of the East of Exeter Green Wedge in the strongest terms.

The land north of Sowton village was included as a draft employment allocation under Strategic Policy 12 in the previous Local Plan consultation. The site was proposed as a high quality employment site comprising a mix of B2, B8, E(g) and other complimentary uses including indoor sports, recreation, crèches and cafes. Waddeton Park Ltd submitted comments to support that draft allocation at the time. Although the current consultation does not specifically seek comments in respect of the proposal to allocate the land north of Sowton village for employment development, this is relevant in the context of the land north of Sowton village, which is currently proposed to be included within the expansive East of Exeter Green Wedge.

The land north of Sowton village should be removed from the green wedge in order to provide certainty over the development potential of this site. The land north of Sowton village performs no function in maintaining the separation and identity of settlements and so its removal from the green wedge is entirely appropriate. The land north of Sowton village is not located between Sowton and Clyst St Mary. Its development will therefore have no impact upon the perception of openness and separation between the settlements. There is no intervisibility between Sowton and development to the north including Clyst Honiton, Blackhorse and Exeter Science Park. This is due to the significant distance between the relevant built up areas and the nature of intervening topography and physical features within the landscape e.g. the A30. Intervisibility between the land north of Sowton and the village of Sowton is extremely limited by virtue of the distance between them and the nature of intervening topography and physical features within the landscape. In the few instances where the site is visible from the village, the visual impact of development in this location can be effectively mitigated/avoided through the implementation of landscaping measures and by leaving certain areas undeveloped.

Taking the above into account, it can be reasonably concluded that the land north of Sowton village does not perform any genuine function in maintaining the separation of settlements or the individual identity of Sowton. It has also been demonstrated that the site can be developed in a manner that effectively mitigates and avoids any perception of physical encroachment upon Sowton.

Concluding Remarks

This response has been submitted on behalf of Waddeton Park Ltd and seeks to secure reallocation of the land north of Sowton as an employment site.

The Second Reg 19 consultation Local Plan as it currently stands, is unsound for the reasons outlined in this response and significant alterations are required in order for the Local Plan to be found sound at Examination.

Land north of Sowton represents a sustainable location for employment development, which is suitable, available and achievable for development within an early stage of the new Local Plan period. Accordingly, consideration should be given by EDDC to releasing this land from the proposed Green Wedge designation and reallocating it for employment development, to meet the identified employment need.

It is respectfully asked that the comments made within this document are taken into consideration and acted upon. It is also requested that Greenslade Taylor Hunt, on behalf of Waddeton Park Ltd, is notified of future planning policy consultation events.

Full name: Claire Alers-Hankey

Organisation (where relevant): Greenslade Taylor Hunt

Other party name (if relevant): Waddeton Park Ltd

Proposal: 12. Our Outstanding Landscape

1. To which part of the Our Outstanding Landscape chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: OL05

1(b). Does your comment relate to one of the changes listed above?: Yes

Full name: Claire Alers-Hankey

Organisation (where relevant): Greenslade Taylor Hunt

Other party name (if relevant): Waddeton Park Ltd

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP06

1(b). Does your comment relate to one of the changes listed in the table above?: No

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: This policy is aimed at restricting development outside of defined settlement boundaries, due to being located in open countryside.

While the aim of this policy is supported at a general level, in circumstances where there are insufficient employment sites allocated for the Plan period, the policy does not offer sufficient flexibility for alternative employment sites to come forward, even in circumstances where a site is sustainably located and where there is a demand for such development. Where a potential employment site is located close to other allocated employment sites, the unallocated site should not be perceived as unsustainable due to being on the wrong side of an arbitrary line. If a site is in a sustainable location, it should be considered suitable for development. Land north of Sowton is one such example. It is located in a sustainable location with excellent transport links to the local and wider strategic road network and is also sited adjacent to other allocated sites within the West End area.

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Organisation (where relevant): Greenslade Taylor Hunt

Other party name (if relevant): Waddeton Park Ltd

Proposal:

3. The Spatial Strategy

1. To which part of the Spatial Strategy chapter does your representation relate?:

Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SP04

1(b). Does your comment relate to one of the changes listed in the table above?: Yes

2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.: This policy seeks to allocate a total of 175.16 hectares of land for employment use. The employment land total includes sites that have planning permission which have not yet been constructed and also 16.5 hectares of employment land at a second new community (now named Marlcombe), to be delivered by 2042. Given the very premature stage that the second new settlement is at, as set out within Policy WS01 of the consultation document, it is considered unrealistic that over 17 hectares of employment land could be delivered within this timescale. There is currently no agreed masterplan for the new settlement, and to expect extensive employment land to have been delivered within the next 17 years (by 2042) is an unachievable timeline. Furthermore, there has been an historic under delivery of employment land within East Devon, as evidenced within the Greater Exeter Economic Development Needs Assessment (EDNA). Therefore, EDDC should be seeking to allocate land well in excess of the 80 hectares mid-point clean growth scenario set out within the EDNA. Paragraph 6.2.2 of the EDNA states, 'The West End of East Devon is the most popular location within Greater Exeter for industrial occupiers. This is due to accessibility to the regional road network and the availability of both serviced land and good quality second-hand options. It is evidence that there is a large quantity of unsatisfied demand.' The new National Planning Policy Framework (NPPF) sets out in paragraph 85, an ambitious strategy with significant weight attributed to the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken to economic development should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. The West End is identified as a strategically important location for economic growth to serve the needs of both EDDC

but also Exeter City, given the proximity to Exeter. The policy as currently drafted is relying on insufficient and unsuitable sites to come forward within an unrealistic time frame. Land north of Sowton has undergone a robust pre-planning analysis, to inform Waddeton Park Ltd of the constraints and feasibility of development in this location. An Outline Planning Application for the development of this site has recently been submitted and is currently awaiting validation. The relevant planning reference is 25/2620/MOUT. The site is in a sustainable location, with close proximity to the regional transport corridor of the M5 and A30 and it is achievable to deliver the site for economic development within the Plan period. Constraints identified with the site are capable of being mitigated through the design process. Therefore, this site should be included as an allocated site for employment within the Local Plan, as previously proposed in the draft Local Plan.

3. Do you consider that this part of the Spatial Strategy chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.: This policy seeks to allocate a total of 175.16 hectares of land for employment use. The employment land total includes sites that have planning permission which have not yet been constructed and also 16.5 hectares of employment land at a second new community (now named Marlcombe), to be delivered by 2042. Given the very premature stage that the second new settlement is at, as set out within Policy WS01 of the consultation document, it is considered unrealistic that over 17 hectares of employment land could be delivered within this timescale. There is currently no agreed masterplan for the new settlement, and to expect extensive employment land to have been delivered within the next 17 years (by 2042) is an unachievable timeline. Furthermore, there has been an historic under delivery of employment land within East Devon, as evidenced within the Greater Exeter Economic Development Needs Assessment (EDNA). Therefore, EDDC should be seeking to allocate land well in excess of the 80 hectares mid-point clean growth scenario set out within the EDNA. Paragraph 6.2.2 of the EDNA states, 'The West End of East Devon is the most popular location within Greater Exeter for industrial occupiers. This is due to accessibility to the regional road network and the availability of both serviced land and good quality second-hand options. It is evidence that there is a large quantity of unsatisfied demand.' The new National Planning Policy Framework (NPPF) sets out in paragraph 85, an ambitious strategy with significant weight attributed to the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken to economic development should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. The West End is identified as a strategically important location for economic growth to serve the needs of both EDDC but also Exeter City, given the proximity to Exeter. The policy as currently drafted is relying on insufficient and unsuitable sites to come forward within an unrealistic time

frame. Land north of Sowton has undergone a robust pre-planning analysis, to inform Waddeton Park Ltd of the constraints and feasibility of development in this location. An Outline Planning Application for the development of this site has recently been submitted and is currently awaiting validation. The relevant planning reference is 25/2620/MOUT. The site is in a sustainable location, with close proximity to the regional transport corridor of the M5 and A30 and it is achievable to deliver the site for economic development within the Plan period. Constraints identified with the site are capable of being mitigated through the design process. Therefore, this site should be included as an allocated site for employment within the Local Plan, as previously proposed in the draft Local Plan.

4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the Spatial Strategy chapter fails to comply with the duty to co-operate. Please be as precise as possible.: The policy fails to provide for employment land growth from Exeter City.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Claire Alers-Hankey

Organisation (where relevant): Greenslade Taylor Hunt

Other party name (if relevant): Waddeton Park Ltd

Proposal:

4. Development at the West End

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS09

1(b). Does your comment relate to one of the changes listed above?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This policy refers to land that is allocated as the Clyst Valley Regional Park (CVRP) and the mitigation measures that will apply to all development proposed within the CVRP.

Land north of Sowton is proposed to be included within the CVRP, however the inclusion of this land is not supported by Waddeton Park Ltd.

While the CVRP allocation does not prevent development in its own right, a number of the mitigation measures required for development within the CVRP as set out in the policy would restrict the level of development that can take place on land north of Sowton. Given that the land north of Sowton holds a strategically important location within the West End, as previously identified by EDDC when the site was a draft allocation in the previous draft Local Plan, to restrict development in this location is not an appropriate strategy and is unjustified, and therefore is not sound.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Waddeton Park Ltd reiterate their previous position that the land north of Sowton should be removed from the CVRP.

Full name: Claire Alers-Hankey

Organisation (where relevant): Greenslade Taylor Hunt

Other party name (if relevant): Waddeton Park Ltd

Proposal:

4. Development at the West End

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here.:
Marlcombe

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This policy proposes the development of a new community on the western side of East Devon. The new community would be a long-term strategic development scheme, with the expectation that the house and employment development will be delivered by 2042, i.e. within the Plan period. While the principle of a new settlement is supported, the detail of how the new community can be delivered is very limited within the consultation document. No masterplan for the new community is included within the original Regulation 19 consultation document. It would appear that the new community concept is being fast-tracked to attempt to progress the Local Plan under the transitional arrangements of the NPPF. EDDC should not be criticised for wanting to progress its Local Plan under transitional arrangements given the work that has already been put into preparation of the Local Plan, however, it does appear that the new settlement concept is at a very early stage and therefore, to expect early delivery of housing and employment development is a very unrealistic target. Whilst it is acknowledged that this Second Regulation 19 consultation document shows plans for Marlcombe at a more advanced stage. The deliverability of the proposals over the plan period is questionable. The deliverability of 16.5 hectares of land in office, industrial and warehouse sectors is particularly optimistic and puts into question the deliverability of the allocation, including both the employment space and new homes targets within the projected timeframes. Accordingly, the employment and housing allocations within this

policy of the consultation document fail the soundness test on the basis of not being effective, with a significant question over the deliverability over the Plan period.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: There is a shortfall for employment land in Exeter City. There is not sufficient land allocated at The West End to accommodate the needs of adjacent LPAs.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Claire Alers-Hankey

Organisation (where relevant): Greenslade Taylor Hunt

Other party name (if relevant): Waddeton Park Ltd

Proposal:

4. Development at the West End

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::
Marlcombe

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: This chapter focuses on continued growth in the West End, where support for high growth is given. The West End is a key strategic location for growth in a highly sustainable area that has seen significant development since 2010, with substantial residential growth, employment opportunities, and has strong functional links to Exeter. The West End offers extensive infrastructure, close proximity to urban services, and efficient transport connections, making it a prime location for further strategic development. Strategic Policy WS01: Development of Marlcombe new community east of Exeter This policy proposes the development of a new community on the western side of East Devon. The new community would be a long-term strategic development scheme, with the expectation that the house and employment development will be delivered by 2042, i.e. within the Plan period. While the principle of a new settlement is supported, the detail of how the new community can be delivered is very limited within the consultation document. No masterplan for the new community is included within the original Regulation 19 consultation document. It would appear that the new community concept is being fast-tracked to attempt to progress the Local Plan under the transitional arrangements of the NPPF. EDDC should not be criticised for wanting to progress its Local Plan under transitional arrangements given the work that has already been put into preparation of the Local Plan, however, it does appear that the new

settlement concept is at a very early stage and therefore, to expect early delivery of housing and employment development is a very unrealistic target. Whilst it is acknowledged that this Second Regulation 19 consultation document shows plans for Marlcombe at a more advanced stage. The deliverability of the proposals over the plan period is questionable. The deliverability of 16.5 hectares of land in office, industrial and warehouse sectors is particularly optimistic and puts into question the deliverability of the allocation, including both the employment space and new homes targets within the projected timeframes. Accordingly, the employment and housing allocations within this policy of the consultation document fail the soundness test on the basis of not being effective, with a significant question over the deliverability over the Plan period.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

Full name: Laura Polley

Organisation (where relevant): Greenslade Taylor Hunt

Other party name (if relevant): Summerfield Homes

Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD13

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here::
Char_04a

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The legal compliance concerns raised by the submitted representation (Summerfield Homes) are: (1) Wrong national policy basis applied at plan-making stage

The letter argues the Council should not rely on the previous NPPF iteration and should instead prepare/examine the Local Plan in accordance with the December 2024 NPPF (and associated housing need calculation approach), because the Second Reg 19 changes are so substantial they amount to a “whole new Regulation 19 document”).

(2) The “Second Reg 19” consultation is said to be a new Reg 19, triggering PPG treatment

The letter cites PPG para 86 (Reference ID 61 086 20250616) and argues that where the content changes significantly, the plan may be treated as having reached Regulation 19 at the later consultation date; consequently, the plan should be progressed under the newer framework.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of

any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Correct the plan-making basis for national policy (NPPF)

What to change: The Council's approach to the applicable NPPF version for examination (and associated evidence/requirements).

Why: The representation contends that the extent of changes at Second Reg 19 means the plan should be prepared/examined against the December 2024 NPPF, not the earlier version relied upon for the first Reg 19 stage.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

Highways / transport support

- The Highway and Transport Review concludes the site is in a sustainable location with key local services (shop, school, hall) within short walking distance and public transport access in the wider vicinity.

- It proposes an access arrangement with a 5.5m access width and visibility splays designed for the 20mph context, and notes no injury collisions in the vicinity within the reviewed period.

- The forecast vehicle trips for around 30 dwellings are described as low (c. 15 two-way trips in AM peak and 14 two-way trips in PM peak; 129 two-way over 12 hours), and the report states impacts would be negligible and acceptable.

Landscape / visual support

- The Landscape Visual Baseline states the site is not within a landscape designation, but lies close to the Blackdown Hills National Landscape, with the National Landscape abutting Chardstock to the north/west.
- The baseline findings indicate views are often limited by existing vegetation and built form; where glimpses occur (including from PRow/bridleways within the National Landscape), mitigation is identified through boundary enhancement and structural planting.
- The report concludes the site would be “deemed suitable for accommodating development” provided mitigation measures are incorporated to assimilate the development into its context.

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Modification 1 — Amend SD13 PRow requirement (clarify or remove)

Issue: The updated SD13 wording is said to be ambiguous and potentially threatens deliverability by requiring a connection to PRow Chardstock Footpath 30 without clarifying where. The letter explains that if the intended connection is at a point where Green Lane is not adopted highway / is unregistered land, it could jeopardise deliverability.

Requested change (as stated in the letter):

- Either remove the requirement to connect to Footpath 30
- Or amend the policy to clarify the precise point of connection and provide planning

Modification 2 — Extend the allocation boundary to include the northern parcel (without increasing dwelling numbers)

Issue: The letter maintains that the adjoining land parcel to the north (also under option) should be included to enable a higher quality scheme, with lower density, enhanced landscaping, public open space, and stronger integration with local character—while retaining around 30 dwellings.

Why this supports soundness: It strengthens effectiveness/deliverability and design/landscape integration, consistent with the landscape strategy principles described in the Landscape Visual Baseline (structural planting, GI breaks, strategic landscaping, SuDS, open space).

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Other party name (if relevant): Waddeton Park Ltd

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE02

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.: The theme within this policy is that outside development limits, support for development will be very limited to expansion of existing sites only, and only within the existing operational site boundaries. There are often circumstances where local businesses want or need to grow, and by restricting the ability of a site to expand beyond the existing operational boundary of a site is overly restrictive and has the potential to stifle local businesses. This is not positively planned, is overly restrictive and is not sound due to being unjustified and ineffective.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)