

Our ref: Reps/Draft

October 2019

FAO Planning Dept
East Devon District Council
Blackdown House
Border Road
Honiton
EX14 1EJ

Dear Sir/Madam

Thank you for the opportunity to comment on The Draft Charging Schedule for East Devon District Council (Hereby referred to as EDDC).

These comments are made on behalf of Persimmon Homes south west (Hereby referred to as PHSW)

Separate to this individual representation additional representation will be made on our behalf by David Lock associates in regards to Cranbrook.

In accordance with the statement of Representations procedure, and in accordance with the community infrastructure levy regulations, I request the right to be heard by the inspector at an examination in respect to of the matters set out below, and related matters, concerning the proposed CIL Charging Schedule at East Devon.

I look forward to your confirmation in due course, of our participation in the examination.

PHSW comments are below:

1.0 Cranbrook

1.1 Persimmon Homes note and supports the zero CIL rate proposed for both residential and retail at Cranbrook. PHSW understand that EDDC recognise the substantial S106 burden, which was outlined in the Cranbrook IDP and the Viability study.

1.2 The extent of this area is consistent with the Cranbrook DPD's proposed Built Up Area Boundary.

1.3 Confirmation of a zero CIL rate at Cranbrook will be a necessary requirement, irrespective of the outcome of the Cranbrook plan.

2.0 Infrastructure list

2.1 The draft charging schedule has presented a draft infrastructure list which closely resembles that of the existing regulation 123 list which is now defunct.

2.2 Persimmon Homes would like EDDC to consider in relation to the delivery of Cranbrook that it may be necessary to attract external funding to support infrastructure, there is a possibility as elaborated to in para 2.1 that CIL receipts may be spent in Cranbrook, 2.1 stating: “the figure will be higher if the Council decide to spend CIL receipts on delivery of Infrastructure at Cranbrook”, this should be a possibility that EDDC consider due to the high infrastructure burden across Cranbrook.

3.0 Impact upon existing outline planning permissions

3.1 It is requested that East Devon District Council provide confirmation that extant Outline planning consents are protected from the potential change in CIL rates Resulting from this review due to the likely impact upon viability and delivery.

3.2 There are areas within the Edge of Exeter zones which have current outline Planning permission. This land will have been purchased through the open market, And planning obligations will have informed development viability (and therefore Delivery). To introduce a variation at this stage – which could impact upon reserved Matters and any new applications within the area – risks delivery

4.0 CIL maps

4.1 In the current approved CIL maps for the map which indicates the area outside of Exeter, the area doesn't fully cover the area that is allocated for Phase 2 of Mosshayne, hence the map should be amended to reflect the allocated development area to help ensure that the development can proceed.

4.2 Considering the GESP has not been published, and there as yet may be another call for sites in EDDC, it seems pre-empive to review and to allocate key areas, when there may be soon a new set of allocated sites, which may be unviable due to this increase In CIL, PHSW would recommend delaying the publishing of the CIL review till after the publishing of the GESP.

4.3 if this was not done can it then be presumed that if there is a new call for sites, and new site allocations that there will also be a CIL review where the CIL maps will be revised and CIL rates reduced in areas that require large scale additional forward funded infrastructure.

5.0 Axminster

5.1 PHSW is pleased to note the change to the boundary plan since our last reps made on the 19/03/2019, the map has now been amended to show the masterplan area.

5.2 However, PHSW do not agree with there not being a 0 CIL rating at Axminster. Axminsters Eastern expansion has a large forward funded S106 infrastructure deriving mainly from the link road between the B3261 and the A359, as well as associated open space, community facilities, employment land and a primary school. Having to pay CIL when we are already going to provide a considerable amount of infrastructure of community benefit may possibly make the whole eastern expansion unviable and could threaten the deliverability of the site, and with it jeopardise the Eastern Expansion and bypass.

5.3 PHSW would like to see Axminsters Eastern Expansion being 0 CIL rated, as the forward funded infrastructure are akin to Cranbrook, and now that precedent is being set for Cranbrook to be 0 rated then Axminster should follow considering the similarities in term of forward funded infrastructure.

I trust that the above representations are helpful to the CIL examination and we look forward to elaborating on them at the inspector's examination.

Yours Sincerely,

Joshua Stevenson

Email: [REDACTED]