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Clinton Devon Estates

**REPRESENTATIONS ON EAST
DEVON DISTRICT COUNCIL'S
CONSULTATION DRAFT PLAN
DECEMBER 2011**

**Plumb Park, Littleham,
Exmouth**

Prepared For

CLINTON DEVON ESTATES

5761

January 2012



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1 EXECUTIVE SUMMARY

1.1 In a nutshell we say:

- There is not enough housing allocated for the District;
- There is not enough housing allocated for Exmouth;
- There is an acute affordable housing problem in the District reflected in Exmouth;
- Of 873 dwellings (already built or with planning permission) that the Council is counting towards its delivery target for housing (and affordable housing) for Exmouth in the plan period only 57 houses are affordable; that's 6.5%; and
- More housing has to be allocated for the District and for Exmouth (to meet the housing needs and especially the affordable housing needs of the town) which should have 25% of the 40% earmarked for towns in the Local Plan

1.2 Of all the strategic sites that have been proposed for Exmouth, Plumb Park, Littleham is closest to all of the town centre, seafront, major public transport hubs and major employment provision¹. These facts, which are supported by our evidence, show that if Exmouth has any aspirations to be a self-sustainable town then this allocation should be favoured over all others.

1.3 To amplify, taking the Brundtland Commission's definition of sustainable development and holistically applying that to Exmouth, Littleham is without doubt the most sustainable location to meet its existing and projected housing need because it would:

- future proof agricultural activities around Exmouth, and in particular the Littleham Valley, helping to protect the hinterland, which is labelled with national environmental designations, in perpetuity;
- lead to biodiversity gains (maize rotations do not encourage biodiversity where well planned housing, open space and green infrastructure could);

¹ PLEASE SEE MAP ATTACHED AS APPENDIX 1

- deliver housing in tandem with, and close to, strategic employment land;
- help deliver the Highways Agency's, District's and Town's visions' of reducing the movement of those living in Exmouth outside the town for employment (and retaining higher skilled and younger people in employment in the town) and in terms of movement around Exmouth provide the opportunity for highly ambitious modal splits by providing vanguard green infrastructure to encourage walking and cycling, all helping to reduce our reliance on fossil fuels;
- in line with the number one priority for the District Council, provide up to 140 affordable homes in a town where the greatest need for such exists helping to maintain balanced communities; and,
- deliver highly sustainable housing to at least Code for Sustainable Homes level 4, reducing energy requirements at a time when costs for non-renewable energy sources are predicted to continue to rise for the foreseeable future.

2 POLICY

- 2.1 In the preparation of this document our clients have paid particular attention to the content of PPS 12 Local Spatial Planning and new and emerging legislation including the Draft National Planning Policy Framework and the Decentralisation and Localism Act.

3 INTRODUCTION CLINTON DEVON ESTATES

3.1 Clinton Devon Estates is a major landowner in East Devon with an ethos of responsible stewardship. It is important economically, environmentally and socially. It:

- Has invested £70m over the last 10 years in Devon;
- Maintains 25,000 acres of countryside;
- Conserves 15,000 acres of AONB;
- Provides 5,000 acres of public access.
- Enables 120 local businesses to thrive;
- Spends approximately £3.5m per annum with local suppliers; and,
- Houses 1500 people in 350 properties.

3.2 Its mission is: 'To secure the long term prosperity of the estate and the people who live and work on it in ways which care for the countryside and engage with the wider community'.

3.3 It has a long standing reputation for delivery and for working with key stakeholders ensuring excellence. It has won the Queen's Award for Enterprise twice in the Sustainable Development category and it is a Sunday Times Top 100 Employer.

4 BACKGROUND

4.1 The Council has been working on its local plan for a number of years. Key milestones include:

- Holding Member and Town Council (including Exmouth Town Council) and Parish Council workshops in 2007 to look at potential planning options;
- Releasing an LDF Issues and Options Paper for consultation in 2008/2009 to which over 400 organisations, including Exmouth Town Council responded;
- Holding a further series of Member and Town Council (including Exmouth Town Council) and Parish Council workshops in 2010 to shape the policy;
- Evaluating potential strategic allocations for Exmouth in 2010 with input from statutory and non statutory consultees; and,
- Releasing a Preferred Approach consultation in 2010/11.

4.2 At every single one of these key milestones Clinton Devon Estates' land at Littleham was supported by Officers of Devon County Council and East Devon District Council and Members of East Devon District Council as the preferred location for housing provision in Exmouth for at least 500 dwellings.

4.3 This remained the case until October 2011 when, based on a very basic drawingsupplied by Exmouth Town Council Task and Finish Forum, (made up of a small number of Exmouth Town Council Members), several (out of a total of 59) of East Devon District Council Members, making up part of a reconvened Local Development Framework Panel, firstly took out the allocation altogether and then settled on a figure of 190 homes to be built at high density on the highest part of land in this area of Exmouth.

4.4 This decision was taken extremely late in the plan making process and based on, at best, barely credible evidence. It ran contrary to the extensive evidence that the Council had taken years to gather and was taken in spite of Officers strongly recommending to Members that the site was sustainable and suitable for residential development.

4.5 In "Exmouth Evaluation of Potential Strategic Allocations" of 2010, which was informed by the evidence gathered and now forms part of the evidence base, the

Council says that: "This site forms a reasonably natural extension to the town; it relates well to the existing settlement and would have limited impact on the existing landscape. [And unlike other sites around Exmouth] It lies outside any landscape designation.²"

- 4.6 Furthermore, Exmouth was identified by the Council as an area centre, the principal settlement in the District, where moderate to large scale development to serve both local needs and those of the surrounding area should occur very much in line with best planning practice of focusing development around existing urban areas where the vast majority of physical, social and community, transport and green infrastructure exists.
- 4.7 Clinton Devon Estates' responded by reviewing five years of work and site assessment and tabled a counter proposal at a later LDF Panel which was informed by evidence, analysis and professional input. This exercise was thorough, wide ranging, costly and it involved numerous professionals. It aimed to demonstrate beyond reasonable doubt why at least 350 houses could provide the optimum solution. By doing this our clients have gone way beyond what others with an interest in land promotion have been asked to do and way beyond what National Guidance advises them to do.
- 4.8 The proposal for at least 350 homes is on a slightly enlarged area, so as to deliver a far wider range of benefits to the local community, including up to 140 affordable homes, lower density housing, around 5.5 Ha of public open space with vanguard green infrastructure linking urban and rural areas, new linear rights of way,

² ALSO ACCORDING TO EDDC: DEVON BIO DIVERSITY RECORDS SHOW NO IMPORTANT SPECIES OR HABITATS ON THE SITE; THE HIGHWAYS AGENCY HAS NO OBJECTIONS TO DEVELOPMENT ON THE SITE THEIR VIEW BEING THAT, IN CLOSE PROXIMITY TO THE TOWN CENTRE, THE SITE IS VERY SUSTAINABLE FROM A HIGHWAYS PERSPECTIVE (PRESUMABLY TO REDUCE OUTWARD BOUND TRIPS THROUGH JUNCTION 30 OF THE M5 WHICH IS ALREADY AT, OR VERY NEAR, CAPACITY) AND IS THE BEST OF ALL CURRENT OPTIONS, IN TERMS OF ACCESS ROUTE CHOICES, ONCE TRAFFIC HAS LEFT THE SITE; AND, SOUTH WEST WATER HAVE NOT RAISED ANY OBJECTIONS TO THE SITE OR EXPRESSED CONCERN THAT ANY CAPACITY CONSTRAINTS OF EXISTING SEWAGE SYSTEMS MAY OCCUR DURING THE DEVELOPMENT'S ROLL OUT TO 2021 THAT CANNOT BE ADDRESSED BY A DEVELOPER'S CONTRIBUTION TO INFRASTRUCTURE INVESTMENT.

woodlands, orchards, hedgerows, landscaping and screening and comprehensive social and community infrastructure provision: in short a full planning obligations package which the 190 proposal could never match.³

- 4.9 Furthermore, our clients employed Meeting Place Communications, a specialist company which works with communities and developers to achieve responsible planning outcomes by devising and managing programmes of public consultation and political engagement across the UK.
- 4.10 All of this was presented to the LDF Panel by the Head of Economy (who is also Head of Planning) who reiterated that Council Officers considered that the site was well related to the town centre, a range of services and employment opportunities and that the proposal put forward should be endorsed by Members.
- 4.11 However, the LDF Panel was not persuaded by the overwhelming evidence before it and instructed Officers to re-consult on 190 homes for Littleham in the Council's New Local Plan 2006 - 2026 Consultation Draft Plan December 2011 and this response is part of that consultation.
- 4.12 Now that Exmouth Town Council has had a chance to reconsider the evidence assembled by our clients it has resolved (at a Meeting on 23 January 2012) to support their proposal for 350 homes at Littleham, and has relayed this, we understand to the District Council.

³ATTACHED AS APPENDIX 3

5 EAST DEVON'S VISION

SECTION 3 VISION FOR EAST DEVON TO 2031

5.1 Paragraphs 3.1 to 3.14 of the Draft Local Plan set out the vision for East Devon: "The Local Plan will help us tackle the challenges we face over the next 20 years and we have created a vision statement to sum up our aims. The vision is aspirational but also it is rooted in realism...We intend this Local Plan to keep East Devon...a place where homes will become affordable. Affordable homes are a top priority for this Council...The town of Exmouth will grow...We...aim to encourage more local jobs to cut down on commuting by cars...East Devon will [facilitate] the change to a low carbon economy...and...[provide] for more balanced communities where homes and jobs are in better alignment by providing major employment, housing and community facilities in Exmouth. [We] will require that new development includes open space and makes links to the surrounding countryside...We will support a strong and viable agricultural sector...focused on: helping local food production [and] maintaining food security and home supply."

5.2 Boiled down, via its stated vision, East Devon wants to:

- Build affordable homes because that is a "top priority" for it.
- Responsibly grow Exmouth.
- Provide more local jobs "to cut down on commuting by cars" (including in Exmouth) and "balanced communities where jobs and housing are in better alignment by providing major employment, housing and community facilities in Exmouth".
- Facilitate the change to a low carbon economy.
- Ensure that new development provides green space and links to the countryside.
- Support a strong and viable agricultural sector.

OBSERVATIONS ON SECTION 3 VISION FOR EAST DEVON TO 2031

5.3 Our clients endorse the sentiment of this vision and what it is trying to achieve for East Devon and Exmouth and our extensive work shows that at least 350 dwellings

at Littleham would dovetail perfectly with, and more importantly help deliver, the essence of the Council's vision because it would:

- Supply up to 140 (40% of 350) much needed affordable homes for Exmouth and East Devon District Council and therefore help provide for Exmouth's needs;
- cut down on out commuting because the site is located close to Exmouth's existing and proposed strategic employment sites meaning that strategic residential development on it would help provide for balanced communities "where jobs and housing [including affordable housing] are in better alignment";
- facilitate the change to a low carbon economy and higher levels of the Code for Sustainable Homes and all that goes with that bearing in mind that commercially viable heat and power networks generally require housing developments of at least 350 dwellings;
- provide 5.5Ha of green space with extensive green infrastructure linkages to urban and rural environments paving the way for very aggressive modal splits and associated benefits; and,
- support a strong and viable agricultural sector because as custodians of a significant proportion of countryside around Exmouth our clients would reinvest capital released from the development to restructure their farming operations locally to improve productivity and competitiveness whilst minimising environmental impacts.

5.4 In short, when viewed holistically, at least 350 dwellings at Littleham would mirror East Devon's vision for true sustainable development an area in which our clients' track record as winners of the Queens Awards in the Sustainable Development category - twice - is hard to match.

6 KEY ISSUES

KEY ISSUES AND OBJECTIVES

6.1 Section 4 is about the key issues and objectives that East Devon's Local Plan should address. Paragraph 4.1 states:

"There are many positive things about East Devon. We have listed some of these below under thematic headings:

1. Jobs and Economic Growth - East Devon is an attractive environment for enterprise witnessed particularly by the number of thriving businesses. We have a vibrant tourism industry and some high quality jobs particularly in the Western part of the District with good access to the Exeter work market too. As a District we have low unemployment rates.
2. Housing - East Devon boasts extremely attractive towns and villages with good quality housing including many fine period properties.
3. Balanced Communities - East Devon healthy living environment and healthy population. Facilities in the District's towns (and larger villages) are good and crime levels are low. We have good schools and friendly people.
4. Transport - East Devon has an extensive road network and our towns have reasonable good public transport. We have two main line rail links, with trains giving direct access to London. We have a vast network of footpaths and a growing cycle route network. Congestion and traffic jams are rare in East Devon except for some roads into Exeter or on the edges of the City.
5. Carbon Emissions and Climate Change - East Devon offers a wide ranging potential for renewable energy generation. There are current proposals for a flagship combined heat and power plant to serve Cranbrook and other eco friendly initiatives in the District.
6. Biodiversity - East Devon has a rich and varied range of species and habitats many nationally and internationally important wildlife sites and significant opportunities for people to enjoy the natural world.
7. Green Infrastructure and Recreation - the green spaces of East Devon's countryside and its extensive coastline ensure that we have an abundance of open and informal recreation space.

8. Landscape, AONBs and the Coastal Zone - East Devon has landscapes of stunning quality, our largely undeveloped coastline forms a part of England's only World Heritage site designated for geological reasons. We have two AONBs which together cover two thirds of the District.
9. Built Heritage - East Devon is rich in built heritage. It has high quality, beautiful villages and towns, and many listed buildings, displaying the wide range of local building materials."

OBSERVATIONS ON KEY ISSUES AND OBJECTIVES

- 6.2 In this context we are taking "key" to mean "something that is crucial", "issue" to mean "an important subject requiring a decision", and "objective" to mean "goal". It seems fair to assume therefore that East Devon's list of "Key Issues and Objectives" should be a list of crucial subjects requiring an action or actions which should be described and which should feed into goals that the Council wants to achieve.
- 6.3 If we are right in our assumptions about what the Council means an example might be: housing is crucial; the type of housing required needs to be decided; the analysis shows that affordable housing is required; the Council aims to set out its policy to deliver affordable housing. Boiled down, affordability of housing is a key issue and the Council aims to provide more of it via its policy.
- 6.4 But Paragraph 4.1 bears no resemblance to the vision at Section 3 and neither attempts to list key issues nor objectives linked to key issues. Instead it lists positive things about East Devon under headings.
- 6.5 Moreover, it bears no resemblance to the Council's Core Strategy Full Consultation Document of August 2010 which gives over eight detailed pages to identifying key issues (instead of the one page given over in this most recent document.) The Council said then that it had been gathering evidence over a number of years which in turn had identified key issues and it is difficult to accept that these issues have now either disappeared or have been dealt with.

6.6 Local Plans should identify key issues and address them and in our view the Council is ducking the key issues that it should be addressing in its Local Plan which include:

- A lack of affordable housing provision and delivery;
- Out commuting for work from its larger towns;
- High numbers of low wage and seasonal jobs and economically inactive people;
- Carbon emissions and climate change; and,
- Physical, Social and Community and Green Infrastructure provision.

6.7 In addition to the above and specifically concerning Exmouth from Council background papers it is clear that its Officers carried out a wide ranging and thorough consultation process over a number of years which involved Exmouth Town Council at all times and which gave rise to three main issues for the town: a lack of family housing; a lack of affordable housing; and too much retirement accommodation.

6.8 In summation we feel that key issues should be listed in the Local Plan, that policy should be geared to deal with them, and the key issues for the Local Plan to deal with include those outlined in paragraphs 6.6 and 6.7 (above) of this consultation response.

7 SPATIAL STRATEGY

SECTION 6 SPATIAL STRATEGY GENERAL

- 7.1 According to the Local Plan the feedback and evidence that the Council received as a result of the previous Issues and Options Consultation highlighted that "having most development in existing urban areas" was preferred and that "more growth at Exmouth" [and at the other main towns] was supported.
- 7.2 Furthermore, the Council's sustainability appraisal and evidence tells it that:
- "Development should be focused on areas that have the greatest amount of services, employment and public transport. The District's main towns [of which Exmouth is the biggest] largely meet this criteria.
 - The Devon Structure Plan sets out policy for an urban focused approach to development."
- 7.3 The plan also recognises that "without development many towns ...will become communities of the retired and wealthy commuters travelling ever longer distances to work... [and that] development, particularly affordable housing and jobs, in towns...will help sustain, enhance, and make them self supporting places to live and work."

OBSERVATIONS ON SECTION 6 SPATIAL STRATEGY GENERAL

- 7.4 In line with the foregoing our clients believe that most development should be steered to existing urban areas like Exmouth where the "greatest amount of services, employment and public transport" exist and which, if properly planned for, would deliver "affordable housing and jobs... [to] help sustain, enhance, and make [the towns of East Devon] self supporting places to live and work" and not places for the retired and wealthy commuters.
- 7.5 Nevertheless, all of this is not reflected in the proposed spatial housing distribution, where only 11% of the total of new homes to be built in East Devon would be built in Exmouth the largest town in the district where 25% of the district's population is housed, and it should be. We go into this in more detail below.

DRAFT STRATEGY 1 OVERALL SPATIAL STRATEGY FOR DEVELOPMENT IN EAST DEVON

- 7.6 This strategy outlines that the District will have to plan for about 15,000 homes and about 180 Ha of employment land.

OBSERVATIONS ON DRAFT STRATEGY 1 OVERALL SPATIAL STRATEGY FOR DEVELOPMENT IN EAST DEVON

- 7.7 EDDC (and its LDF Panel) has already accepted that the analysis behind the south west's Regional Spatial Strategy (RSS) is robust. The RSS said that 17,100 new dwellings should be accommodated in East Devon. In spite of this the Council has decided to consult on only 15,000 dwellings. Based on the evidence behind the RSS, our clients believe that more housing should be allocated in the District with around 25% of any allocation allocated to Exmouth (all based on past trends).

DRAFT STRATEGY 2 SCALE AND DISTRIBUTION OF DEVELOPMENT IN EAST DEVON

- 7.8 The approach would involve East Devon's West End accommodating about 50% of the houses and about 50% of the employment land required, the towns of East Devon accommodating about 40% of the houses and about 40% of the employment land required with the remainder in to be accommodated in the rest of the District.
- 7.9 For Exmouth, the table forming Draft Strategy 2 tells us that: there have been 482 dwellings built in the town between 2006/7 and 2010/11; 391 dwellings have planning permission; 137 dwellings have made significant progress through the planning system (whatever that means); 540 new dwellings are proposed via strategic allocations; and, 150 dwellings are still to be allocated; all giving a total of 1,700 dwellings.
- 7.10 The "General Overarching Note" on the table tells us that: "All figures are a first assessment only...and need refining. In some cases they will show gross development levels and translation into net provision will result in reductions being made. In addition there is the potential for double counting and also some

permissions counted in the assessment may have not been built and will have now expired. A non implementation rate is not applied. The grand total should be considered as an upper estimate."

OBSERVATIONS ON DRAFT STRATEGY 2 SCALE AND DISTRIBUTION OF DEVELOPMENT IN EAST DEVON

- 7.11 Our clients OBJECT to Draft Strategy 2.
- 7.12 Notwithstanding that the Council heavily caveats its own figures for Exmouth leaving them open to question, we can see from EDDC's most recent Annual Monitoring Report (AMR) of March 2011 that over the last 15 years (to 2009/10) Exmouth has contributed an average of 145 dwellings per annum out of an average total across the district of 490 dwellings per annum, equating to 30% of the total provision.
- 7.13 However, in the last 5 years of the same 15 year period, some of which was during a property boom, Exmouth contributed an average of 107 dwellings per annum out of an average total across the district of 490 dwellings per annum, equating to 22 % of the total provision.
- 7.14 These figures show that Exmouth has delivered somewhere between 20% and 30% of the total houses built in East Devon in the last 15 years very much in line with the fact that: Exmouth houses 25% of the total population of the District.
- 7.15 The slowdown in performance in the last 5 years of the aforementioned 15 year period indicates that it is getting harder to develop within the existing Built up Area Boundary (BUAB) and that to deliver the housing numbers that the town clearly needs strategic land has to be allocated to meet demand; and for the reasons stated herein our clients' land at Littleham is the most suitable site for strategic housing development in Exmouth.
- 7.16 There is no sensible reason to deviate from the foregoing line meaning that based on a figure of 15,000 homes, the Local Plan should provide for 3,750 houses in Exmouth, however, it makes provision, on the face of it at least, for only 1,700 houses which is 11% of the amount required by the plan.

- 7.17 Essentially, there is not enough housing allocated for Exmouth even if that figure is 1,700 (which we dispute and go into in more detail below) and the spatial housing strategy does not deal with a key related issue - affordable housing delivery in Exmouth - all leaving the plan unsound in our view. More housing to deliver the right type of housing should be allocated for Exmouth.
- 7.18 Therefore, our clients OBJECT to Draft Strategy 2. It should be revised to make reference to an increased number of homes for Exmouth which our clients consider to be a more appropriate level for the town. Based on much of what we say herein the number of homes that should be allocated for Exmouth should be in the region of 25% of the total allocation and the number should come from the 40% of the total allocation that is to be allocated to the towns of East Devon.
- 7.19 It is considered that the current approach is contrary to that required under national planning policy. PPS3 states that the Government's objective is to 'ensure that the planning system delivers a flexible, responsive supply of land.' (paragraph 53). PPS3 adds that once identified, the supply of land should be managed so that there is a continuous five year supply of deliverable sites (i.e. those which are available, suitable and achievable) (paragraph 57). The proposed allocation for Exmouth would not accord with any of these requirements.
- 7.20 The Draft Local Plan makes it clear (at paragraphs 6.7 to 6.11) that key objectives include the delivery of an adequate level of new homes to meet anticipated demand and that securing affordable housing will be a particularly important part of this. The Local Plan also makes it clear that there is a need to generate new employment and that this will be tied to the delivery of new housing. For the Local Plan to be considered sound it must therefore make provision to ensure these objectives are met.
- 7.21 In our clients' view, the current under supply for Exmouth is very likely to lead to a situation whereby the Council cannot meet these objectives. This would suggest that the approach currently being proposed in the Local is incapable of being judged as sound.
- 7.22 Our clients would suggest that a more robust approach would be to increase the proposed allocation at Exmouth to similar levels previously put forward by the

Council (in its Core Strategy Consultation Documents) or higher. It is also our clients' view that the failure to make adequate provision in the draft Local Plan potentially exposes the Council to having to accept speculative housing schemes in the future, resulting of a failure to demonstrate an adequate housing supply in Exmouth. This would clearly be contrary to the principles of good plan making.

7.23 As a result of the issues set out above, in our clients' view, the spatial strategy for the Local Plan should be amended to:

- Make provision for a higher number of new homes, in line with the 17,000 homes proposed in the draft RSS; and,
- Increase the overall level of provision proposed at Exmouth to 25% of the total allocation which should come from the 40% of the overall provision to be allocated to the towns - our extensive work shows that our clients' land at Littleham could accommodate more than 500 dwellings and it should be allocated for at least 350 dwellings.

DRAFT STRATEGY 3 SUSTAINABLE DEVELOPMENT

7.24 This draft strategy says that the Council is committed to sustainable development by conserving and enhancing the environment, prudently using natural resources, promoting social well being, encouraging economic development, and taking a long term view.

OBSERVATIONS ON DRAFT STRATEGY 3SUSTAINABLE DEVELOPMENT

7.25 Our clients, a generational business which always takes the long term view, fully endorse this strategy and Plumb Park, Littleham is true sustainable development combining all of housing delivery, economic development, aggressive modal splits, and stewardship of natural and built environments.

DRAFT STRATEGY 4BALANCED COMMUNITIES

7.26 This says: "By balanced communities we mean that in any area or neighbourhood there is a match between the jobs, the homes and the educational, social and community facilities. Ideally also in the range of ages in the residential population. Key components of a balanced community include:

1. Securing employment provision... [which] should reduce the need for commuting - where housing is proposed we will require new job provision.
2. Securing social, health and community and educational facilities....new housing should secure their provision and keep the community vibrant and viable;
3. Getting more aged balanced communities - many East Devon communities have an overtly aged population profile. Where this is the case we will encourage residential development that will be suited to or provide for younger people and younger families."

OBSERVATIONS ON DRAFT STRATEGY BALANCED COMMUNITIES

- 7.27 We agree with the thrust of this strategy and feel that providing jobs in tandem with housing (it does not matter which is the driver) is a good starting point from which to create balanced communities and lower out commuting figures. Social and community infrastructure should be provided as part of any strategic development and we are committed to doing that at Littleham.
- 7.28 Furthermore, we are very heartened to see that the Council will "encourage residential development that will be suited to or provide for younger people and younger families" because this is exactly what Littleham would do. We feel that "getting more aged balanced communities" means that the right type of housing has to be provided and Exmouth, in recent years, has been providing housing for the wealthy and the retired (with only about 6.5% of it affordable) and it has suffered as a result.
- 7.29 Littleham, for example, is the poorest ward in East Devon where the school roll has fallen and where, unfortunately, good quality social and community fabric is lacking. We have made ourselves acutely aware of the educational issues in Littleham, and have had meetings with the headmaster of the school with a view to investing in both the school itself and the development to provide a new access and vanguard green infrastructure links around it and to and from it.
- 7.30 Essentially, Plumb Park would tie into the existing urban fabric of Littleham and close to existing strategic employment sites, allow for investment in social and community infrastructure, including education, and green infrastructure, all raising the quality of new development whilst raising the socio economic profile of

Littleham as it exists, thereby creating a balanced community in this part of Exmouth completely in line with this draft strategy.

DRAFT STRATEGY 5 ENVIRONMENT

7.31 This strategy says: "All development proposals will contribute to the delivery of sustainable development, ensure the protection and enhancement of natural and built environmental assets and geodiversity...[and that] the restoration, enhancement and expansion and linking [of open spaces and such like] to create green networks will be encouraged through a combination of measures such as:

1. Maximising opportunities for the creation of green infrastructure and networks in sites allocated for development;
2. Creating green networks and corridors to link urban areas and wider countryside...

New development will incorporate open space and high quality landscaping to provide attractive and desirable environments for new occupants and wildlife. It will contribute to a network of green spaces. Where there is no conflict with biodiversity interests, the enjoyment and use of the natural environment will be encouraged and all proposals should seek to encourage public access to the countryside."

OBSERVATIONS ON DRAFT STRATEGY 5 ENVIRONMENT

7.32 We give our support to this strategy because development of the land at Littleham would mirror it thus:

- it would future proof agricultural activities around Exmouth, and in particular the Littleham Valley, helping to protect the countryside much of which has national and international environmental designations;
- lead to biodiversity gains;
- deliver housing in tandem with, and close to, strategic employment land allowing for the attainment of ambitious modal splits;
- provide for a 5.5 Ha hill top park and extensive green infrastructure linkages to urban and rural environments for all.

8 EXMOUTH

SECTION 10 EXMOUTH GENERAL

8.1 According to the Local Plan the feedback and evidence that the Council received as a result of the previous Issues and Options Consultation highlighted that "concerns have been raised about high levels of commuting out of town to jobs in Exeter...[the] need for more affordable housing was highlighted as a key issue... [and] the two key strategic housing allocations sites allocated in the plan are particularly suited to residential development. A study was undertaken of potential allocation sites in 2009."

8.2 Furthermore, the Council's sustainability appraisal and evidence tells it that:

- "Increased housing in Exmouth should be matched by job and service provision to assist in the town's self containment, reduce commuting, cut negative effects on air quality and also improve access to services."

8.3 The Council also recognises that of the 36,000 people living in the town only 14,500 are economically active and that 6,500 of these people commute to work in other areas with half to Exeter.

OBSERVATIONS ON SECTION 10 EXMOUTH GENERAL

8.4 Our clients feel that the Local Plan as proposed is at odds with the Council's own evidence for the district and for Exmouth. It is difficult to comprehend why, and the figure is arguably much lower anyway in our view, only 1,700 houses (11% of the total required in the plan) have been earmarked for Exmouth and why only 190 have been earmarked for Littleham when:

- from EDDC's most recent Annual Monitoring Report (AMR) of March 2011 we can see that Exmouth over the last 15 years (to 2009/10) has contributed an average of 145 dwellings per annum out of an average total across the district of 490 dwellings per annum, equating to 30% of the total provision.
- the previous Issues and Options Consultation highlighted that "concerns have been raised about high levels of commuting out of town to jobs in Exeter..."

[the] need for more affordable housing was highlighted as a key issue...[and] the two key strategic housing allocations sites [one of which is our site at Littleham] allocated in the plan are particularly suited to residential development"; and,

- when the Council's Sustainability Appraisal says that housing (the right type of housing needs to be delivered and in this instance that is affordable housing and other family housing) and jobs should be provided together (reinforced by the facts that of the 36,000 people living in the town only 14,500 are economically active and that 6,500 of these people commute to work in other areas with half to Exeter).

8.5 Local Plan policy should reflect the evidence gathered which strongly suggests that more housing should be provided in Exmouth, more affordable housing should be provided for Exmouth and more housing should be delivered at Littleham close to the town's existing and proposed strategic employment sites.

DRAFT STRATEGY 17 DEVELOPMENT AT EXMOUTH

8.6 This draft strategy says: "The preferred approach for Exmouth will see larger scale development. Working with our partners in Exmouth, over the 2011 to 2026 period, we will specifically plan for and promote:

1. New Homes - around 830 homes to be built, in addition to the homes already with planning permission or under construction.

2. Jobs - significant new employment provision is proposed for the town.

3. Town Centre - significant investment in new retail and commercial facilities in the towncentre is proposed.

4. Social and Community and Leisure Facilities - new facilities to serve the needs of residents. These include enhanced medical services, library and other commercial services.

5. Infrastructure:

- upgrading of public transport provision to Exeter, primarily through enhancement of public transport improvements.

- Completion of Dinan Way, this highway completion is likely to require developer contribution funding from all future developments in or near to Exmouth.

The current Local Plan Built-up Area Boundary for Exmouth will be retained, however strategic land allocations are proposed at the following locations:

a) Goodmores Farm - mixed use development for 350 homes and around 5 hectares of land for mixed use employment (3ha) and community and commercial facilities.

b) Phase 3 at Liverton Business Park - around 3 hectares of employment land. Liverton Phase 2 does have planning permission but it is also calculated into allocations with 8 hectares.

c) Littleham Valley - around 190 new homes.

d) In addition to these strategic allocations 150 homes will be accommodated on sites to be identified through future phases of plan production."

OBSERVATIONS ON DRAFT STRATEGY 17 DEVELOPMENT AT EXMOUTH

8.7 Our clients OBJECT to this Draft Strategy.

8.8 Based on the past performance of Exmouth delivering between 20 and 30% of the total housing provision in East Devon planning for 1,700 dwellings to serve Exmouth for 20 years is not nearly enough and if EDDC is to deliver 15,171 houses then 1,700 houses is only 11% of that total.

8.9 We can see from EDDC's own figures (in its most recent AMR) that of the 482 dwellings built between 2006/2007 and 2010/2011 that it says is contributing to the 1,700 figure of these only 3 developments met the threshold necessitating the need for affordable housing provision; one for 23 dwellings; one for 18; and one for 40. Even if all of these deliver the full policy requirement of 40% affordable only 32 dwellings out of 482 are affordable; that's 6.5%!

- 8.10 If we reasonably apply these figures to the 391 dwellings under construction or with planning permission then out of a total of 873 dwellings that the Council is counting towards its delivery target for housing (and affordable housing) only 57 houses are affordable!
- 8.11 According to EDDC the 137 houses that have made progress are made up of 75 at Rolle College with the remainder at Hill Crest. But both sites are similar to the aforementioned sites and we are therefore reasonably assuming that the affordable housing delivery rate will be the same 6.5%.
- 8.12 This notwithstanding we question whether the development model for Rolle College would be implementable because according to the Local Plan Rolle Exmouth Ltd has only until 2014 to raise funds to purchase the site. If it cannot do that then the comprehensive development of the will at best be considerably delayed and at worst a non starter in the plan period. There are question marks over the capacity at Hillcrest too.
- 8.13 Consequently, we are of the view that the figure of 137 is questionable at best and cannot be relied upon and therefore should be taken out of the plan. Instead the sites should be viewed as potential windfall sites.
- 8.14 The Local Plan says that 150 dwellings are to be allocated at a later date. We feel that this should not be part of the policy and that the 150 should be allocated now especially when we consider that we have shown that our site could comfortably hold at least 350 dwellings without harm instead of the 190 currently shown in the plan.
- 8.15 This all leaves 540 dwellings as strategic allocations currently made up 350 at the unsustainable location of Goodmores Farm and our 190 at a highly sustainable location, Littleham.
- 8.16 We say why Littleham is the most sustainable location for residential development in Exmouth elsewhere in the document. Goodmores Farm is an unsustainable location for housing development in comparison because it is:
- much closer to sensitive hinterland, which is labelled with international and

national environmental designations;

- further away from all of the town centre, seafront, major public transport hubs and major employment provision and its allocation would affect the ability of Exmouth to be a self-sustainable town;
- further away from the town's existing and proposed strategic employment land at odds with the Highways Agency's, District's and Town's visions' of reducing the movement of those living in Exmouth outside the town for employment; and,
- requires significant investment in infrastructure (Dinan Way link⁴) which in turn will affect the amount that the development could contribute to social and community fabric and much needed affordable homes in a town and district where a great need for such exists.

8.17 On the subject of affordable housing, EDDC has an acute affordable housing issue, reflected in Exmouth, the largest town. At the previous Local Plan Inquiry the Inspector accepted that, based on robust evidence presented by EDDC that developments should deliver 40% affordable housing. Regarding this figure, the Council has dramatically under performed. This is reflected in Exmouth. Set against this backcloth the plan favours dropping its affordable housing target figure in Exmouth from 40% to 25%.

⁴ ACCORDING TO THE COUNCIL IF LAND IS TO BE ALLOCATED FOR STRATEGIC DEVELOPMENT TO THE NORTH OF THE TOWN THEN THE DINAN WAY LINK SHOULD BE DELIVERED.

THE DELIVERY OF THE DINAN WAY LINK HAS TO BE FUNDED BY DEVELOPMENT IN EXMOUTH (WE ROBUSTLY QUESTION WHETHER THE PLANNING SYSTEM WOULD ALLOW FOR SUCH FUNDING TO "COME FROM ALL FUTURE DEVELOPMENTS IN OR NEAR TO EXMOUTH" CIRCULAR 05/2005 REFERS).

THE HIGHWAYS AUTHORITY HAS CONSULTED ON TWO POSSIBLE ROAD ALIGNMENTS FOR THE DINAN WAY LINK BOTH OF WHICH GO THROUGH THIRD PARTY LAND MEANING THAT THE OWNERS OF THAT LAND WILL FACILITATE THE DINAN WAY LINK ONLY IF IT IS COMMERCIALY SENSIBLE FOR THEM TO DO SO AND WE'D SUGGEST THAT IN REALITY THIS MEANS THAT THEY WOULD REQUIRE VALUE FROM ANY STRATEGIC ALLOCATION AT GOODMORES FARM.)

8.18 In line with what we have said above, the draft strategy should be amended to:

- Make provision for a higher number of new homes, in line with the 17,000 homes proposed in the draft RSS;
- Increase the overall level of provision proposed at Exmouth to 25% of the total provision for the Districtor higher which should come from the 40% of the overall provision to be allocated to the towns; and,
- Allocate at least 350 dwellings on our clients' land at Littleham since our extensive work shows that the land could accommodate more than 500 dwellings. (And whether Goodmores farm is allocated or not and for the avoidance of doubt we believe for the reasons cited herein that the Council should favour a strategic allocation at the Littleham site over all others put forward in and around the town)

9 SMALLER TOWNS VILLAGES AND COUNTRYSIDE

SECTION 15 SMALLER TOWNS VILLAGES AND COUNTRYSIDE GENERAL

- 9.1 This section says that: "More than any other human activity, farming has shaped the landscape of East Devon...Farming and allied trades and businesses remain integral to the present and future of East Devon...The Council will seek to work with partners to secure a viable agricultural sector and promote development that will help and retain and enhance farming, including cases where development, diversification and business activity would add value to agricultural...practises".

OBSERVATIONS ON SECTION 15 SMALLER TOWNS VILLAGES AND COUNTRYSIDE GENERAL

- 9.2 We are very pleased that the Council understands the role that agriculture has played and still plays in the local economy and that it wants to help agricultural and other rural businesses. Development at Littleham would be diversification and restructuring of a rural business on a grand basis commensurate with the size of the countryside enterprise which is Clinton Devon Estates. The Council needs to acknowledge this.

DRAFT STRATEGY 24 SUSTAINING AND DIVERSIFYING RURAL ENTERPRISES

- 9.3 According to the draft strategy "The Preferred Approach is that the Local Plan will provide for developments that will help sustain and diversify agricultural and traditional rural enterprises and add value to rural produce production."

OBSERVATIONS ON DRAFT STRATEGY 24 SUSTAINING AND DIVERSIFYING RURAL ENTERPRISES

- 9.4 In addition to what we have said at 9.2 above we appreciate the sentiment of this draft strategy and highlight that over past 25 years the number of farms on Clinton Devon's Estate has reduced from 75 to just over 30 and that this trend will continue. For example, over time, Maer Farm needs to merge with other farms and substantial investment has to take place to ensure it is productive, profitable

and meets all the current and pending environmental legislation, including NVZ and Water Framework Directives. (The farm is on an urban fringe with serious challenges in achieving sensible scale economies.) By developing Plumb Park, Littleham, Clinton Devon Estates would release funds to effect strategic amalgamation of, and investment in, farms. By not developing Littleham no investment of substance would occur and farms on the Estate would become increasingly challenged and unviable putting unwanted pressure on the countryside much of which is labelled with national and international designations.

10 ENSURING WE HAVE THRIVING COMMUNITIES

SECTION 16 ENSURING WE HAVE THRIVING COMMUNITIES GENERAL

10.1 It is interesting that though the Local Plan refers to the concept of thriving communities it does not define what they are. We are taking thriving communities to mean communities that are resilient and adaptable; communities with an ability to renew.

OBSERVATIONS ON SECTION 16 ENSURING WE HAVE THRIVING COMMUNITIES GENERAL

10.2 We fully endorse what EDDC says here but we again highlight that the delivery of such is not guaranteed. In our recent experience, gained through our extensive public consultation work to date, though Littleham is the poorest ward in East Devon, it shows signs that it has the ability to be a thriving community; local residents groups exist, the school's headmaster and governors are forward thinking and the people are engaging. However, it will require help and our proposals would provide a significant amount of the help required.

DRAFT STRATEGY 25 PROMOTING OPPORTUNITIES FOR YOUNG PEOPLE

10.3 This says: "Support will be provided for initiatives that promote enhanced opportunities for access to further education, housing suitable for first time buyers and training/apprenticeships posts for young people. Large scale development proposals should incorporate measures to promote these outcomes/initiatives."

OBSERVATIONS ON DRAFT STRATEGY 25 PROMOTING OPPORTUNITIES FOR YOUNG PEOPLE

10.4 Again we fully endorse the thrust of this draft strategy but words are not enough; delivery is the most important thing. In the first instance the support that the Council says that it wants to provide has to be given by allocating enough land to deliver the aspiration: more housing should be allocated in Exmouth and more housing should be built on our land all of which in turn would lead to the results that Draft Strategy 25 seeks.

DRAFT STRATEGY 29 DISTRICT WIDE AFFORDABLE HOUSING PROVISION TARGETS

10.5 "Affordable housing will be required on all developments within East Devon where there is a net gain of one dwelling. Within [areas like Exmouth] a minimum of 25% of the dwellings shall be affordable unless viability evidence shows that a higher percentage is achievable...For the purposes of this schedule:(1) 'towns' are defined as the area within the Built-up Area Boundary and any abutting land;(2) 'major' is a proposal for 300 or more homes;...Outside of the areas listed in the above table 50% of the dwellings shall be affordable, subject to viability considerations. The affordable housing provision should seek to achieve a target of 70% social or affordable rent accommodation and 30% intermediate or other affordable housing."

OBSERVATIONS ON DRAFT STRATEGY 29 DISTRICT WIDE AFFORDABLE HOUSING PROVISION TARGETS

10.6 The Council says that a "top priority" for it is to deliver affordable housing given that it has an acute affordable housing issue reflected in Exmouth. At the previous Local Plan Inquiry the Inspector accepted that, based on robust evidence, EDDC should deliver 40% affordable housing. For various reasons the Council has not been remotely close to attaining this figure.

10.7 Set against this backcloth the Local Plan is proposing to drop the affordable housing % in Exmouth from 40% to 25%. East Devon and in particular Exmouth needs affordable housing and based on past trends strategic land has to be allocated to do it.

10.8 Essentially, a key issue is the delivery of affordable housing in Exmouth and this has to be a strategic objective for the Local Plan to address. It does not do this in our view and it should. Moreover, a scheme for at least 350 dwellings on our land would hit right at the heart of this issue because it would deliver up to 40% (140) of the 350 units as affordable dwellings.

11 CLIMATE CHANGE

SECTION 17 CLIMATE CHANGE GENERAL,DRAFT STRATEGY 32 SUSTAINABLE DESIGN AND CONSTRUCTION,DRAFT STRATEGY 33 RENEWABLE AND LOW CARBON ENERGY PROJECTS, DRAFT STRATEGY 34 DECENTRALISED ENERGY NETWORKS, AND DRAFT STRATEGY 35 ALLOWABLE SOLUTIONS

11.1 Draft Strategy 32 aims to ensure amongst other things that homes are built to Code for Sustainable Homes Level 4. Draft strategy 33 gives in principle support to renewable or low carbon energy projects in development. Draft Strategy 34 says: "Decentralised Energy Networks will be developed and brought forward. New development(either new build or conversion) with a floor space of at least 1,000m² or comprising ten or more dwellings should connect to any existing, or proposed, Decentralised Energy Network in the locality to bring forward low and zero carbon energy supply and distribution. Where there is no existing Decentralised Energy Network in the locality, proposals for larger developments of 10 hectares (either housing or other buildings) or 300 houses should evaluate the potential for such systems and implement them where they are viable over the life of the developments in the locality. Consumer choice of energy sources will be retained when decentralised Energy networks are developed." Draft strategy 35 is to do with off site renewable energy generation.

OBSERVATIONS ON SECTION 17 CLIMATE CHANGE GENERAL,DRAFT STRATEGY 32 SUSTAINABLE DESIGN AND CONSTRUCTION,DRAFT STRATEGY 33 RENEWABLE AND LOW CARBON ENERGY PROJECTS, DRAFT STRATEGY 34 DECENTRALISED ENERGY NETWORKS, AND DRAFT STRATEGY 35 ALLOWABLE SOLUTIONS

11.2 We welcome the thrust of this section and it is pleasing that it the Council will help facilitate the change to a low carbon economy. It will know from work commissioned by its Growth Point Team that on strategic development sites combined heat and power is by far the most cost effective way of hitting higher code levels (of the Code for Sustainable Homes) and that combined heat and

power networks need at least 350 dwellings to have any chance of being viable, and hence delivered.

- 11.3 Our clients have held a series of meetings regarding the potential installation of a biomass wood chip district heating system at Littleham. This could provide each house with a dual fuel supply (i.e. bio mass heat and also normal gas). The "Energy Centre" would provide boiler(s) to 3 MW capacity and consume (at about 350 houses) around 2,000 tonnes of timber a year which, given our clients' business, could be supplied by their own woodlands around Exmouth sustainably and chipped at their existing bio mass centre near Colaton Raleigh / Newton Poppleford.
- 11.4 Such a system could meet over 90% peak demand for heat and if the load was exceeded then gas supply would kick in. Bio mass heat would be around 10% lower in price (guaranteed) than gas and the carbon savings for the development would be huge.
- 11.5 However, though such a scheme would be extremely exciting for Exmouth, the Estate, residents of the development and, potentially, the school, to achieve this at least 350 homes would have to be provided for at the site.

12 NATURAL AND BUILT ENVIRONMENT

SECTION 18 OUR OUTSTANDING NATURAL AND BUILT ENVIRONMENT GENERAL, DRAFT STRATEGY 36 GREEN INFRASTRUCTURE PROVISION AND STRATEGY, DRAFT STRATEGY 40 LANDSCAPE CONSERVATION AND ENHANCEMENT AND AONBS, DRAFT STRATEGY 42 LOCAL DISTINCTIVENESS AND BUILT ENVIRONMENT, AND DRAFT STRATEGY 43 THE BUILT HERITAGE AND BUILDING CONSERVATION

12.1 The gist of Section 18 is that East Devon has truly outstanding built and natural environments worthy of protection recognised by the national and international designations which cover many parts of it.

12.2 Draft Strategy 36 says: "We will develop a District wide Green Infrastructure Strategy and will focus on delivery of Strategic Projects and Investment Programmes. The document will produce separate sections for each town (Area Frameworks) linked to the rural parts of the District to ensure that consistency and a comprehensive output is achieved."

12.3 Draft Strategy 40 says "Development will need to be undertaken in a manner that is sympathetic to and helps conserve and enhance the quality and local distinctiveness of the natural and historic landscape character of East Devon, in particular in Areas of Outstanding Natural Beauty.

Development will only be permitted where it:

1. Conserves and enhances the landscape character of the area; and
2. does not undermine landscape quality; and
3. Is appropriate to the economic, social and well being of the area.

When considering development in or affecting AONBs, great weight will be given to conserving and enhancing their natural beauty."

12.4 Draft Strategy 42 is about reinforcing local distinctiveness via good design to "ensure that [towns such as Exmouth] retain their intrinsic qualities or where despoiled seek to have these qualities reinstated through good design" and Draft Strategy 43 is about conserving and enhancing the physical and cultural heritage [of towns like Exmouth.]

OBSERVATIONS ON SECTION 18 OUR OUTSTANDING NATURAL AND BUILT ENVIRONMENT GENERAL, DRAFT STRATEGY 36 GREEN INFRASTRUCTURE PROVISION AND STRATEGY, DRAFT STRATEGY 40 LANDSCAPE CONSERVATION AND ENHANCEMENT AND AONBS, DRAFT STRATEGY 42 LOCAL DISTINCTIVENESS AND BUILT ENVIRONMENT, AND DRAFT STRATEGY 43 THE BUILT HERITAGE AND BUILDING CONSERVATION

12.5 A Man from the past: "[He is] one of those great landowners who recognise most fully that property has its duties as well as its rights....the difficulty when one desires to refer to [his] public benefactions is to know where to commence....A modest summary would have to include helping to fund the restoration of Exeter Cathedral and of many churches on his Estate, the building of churches at Beer and Budleigh Salterton and the rebuilding of the Holy Trinity, Exmouth. Also in Exmouth, he was the chief contributor to the erection of the Jubilee Clock Tower, leased the Manor Gardens to the town (returning the rent each year), contributed to the formation of the Beach gardens and paid for the upkeep of the Strand enclosure...He was instrumental in the creation of ...[an East Devon] railway, gave financial support to the Royal Devon and Exeter hospital and gave land [for the hospital] at Budleigh Salterton...He was the principal contributor to the support of schools on his Estate, including those at East Budleigh, Budleigh Salterton, Otterton and Newton Poppleford...,he piped water...to East Budleigh and Colaton Raleigh at his own expense"⁵ and provided top quality housing for his Estate workers.

⁵ MARK ROLLE'S OBITUARY - "MARK ROLLE HIS ARCHITECTURAL LEGACY" FORD A 2002

- 12.6 Who was this amazing man, who, as a major landowner, was completely in touch with his social and community responsibilities and with his responsibilities for the protection of the natural and historic built environments, and Exmouth in particular, and when did he live?
- 12.7 The man was Mark Rolle who lived between 1835 and 1907 and who owned what is now Clinton Devon Estates. His portrait hangs in the Clinton Devon Estates' boardroom and his ethos has been ingrained into the organisation. The present day Clinton Devon Estates takes great pride in following in the footsteps of him and is fully aware of its responsibilities to Exmouth and the countryside around it.
- 12.8 There is no doubt that East Devon has truly outstanding built and natural environments worthy of protection and our clients fully endorse the thrust of Section 18 not least because they are responsible for significant parts of the natural and built areas afforded the highest protection.
- 12.9 Our clients have ambitious but realistic plans for Littleham (which is unburdened by any landscape designations) - in line with Mark Rolle's beliefs and legacy - reflected in the social and community infrastructure package that would be offered and the development of masterplan principles around top quality design, renewable energy networks, a 5.5 Ha hill top park and vanguard green infrastructure linking urban and rural environments.

13 DELIVERY AND INFRASTRUCTURE PROVISION

DRAFT STRATEGY 44 INFRASTRUCTURE DELIVERY

13.1 Verbatim this draft strategy says: "The Council will produce an Infrastructure Delivery Plan to set out how the implementation of Local Plan policies and proposals will be supported through the timely delivery of infrastructure improvements. It will be produced alongside the Local Plan and form part of the Council case at Submission and Examination. It will detail local and strategic schemes and set how much they will cost, who will lead on provision and who the relevant partners will be. Developer contributions will be sought to ensure that the necessary infrastructure improvements are secured to support the delivery of development and mitigate any adverse impacts. The Council will introduce the CIL alongside the Local Plan. The Levy Charging Schedule will be the subject of a joint examination with the Local Plan. The Infrastructure Delivery Plan will set out which items of infrastructure are expected to be funded through the Levy and which will be secured through Section 106 agreements. Through Section 106 Agreements and negotiations over site development and where otherwise not met through alternative committed schemes or proposals the Council will ensure that:

1. Infrastructure requirements that arise as a direct consequence of developments are met in full and to serve the needs of the proposal and occupants and users.
2. The loss of, or adverse impacts on, any significant amenity or resource present on the site prior to the development is offset by the provision of alternative facilities that are of equal or greater value.

Infrastructure provision should be phased to meet development and failure to provide or absence of relevant infrastructure will be grounds to justify refusal of permission."

OBSERVATIONS ON DRAFT STRATEGY 44 INFRASTRUCTURE DELIVERY

13.2 Exmouth is the principal settlement in the District where large scale development to serve both local needs and those of the surrounding area should occur which is in line with best planning practice of focusing development around existing urban

areas where the vast majority of physical, social and community, transport and green infrastructure exists.

- 13.3 Our own Highways Consultants tell us that this site could accommodate more than 500 dwellings without huge physical infrastructure costs (which is supported by both the Highways Agency and the Highways Authority). A development of 350 houses or more could provide a full planning obligations package.
- 13.4 That all said there must be serious question marks over the soundness of the plan in the round given that the Council's approach is to allocate land first then cost the infrastructure required. What if strategic development sites cannot support the infrastructure required? Surely, to prove that the Local Plan is deliverable, infrastructure costs have to be part of the front end of the policy making process so that it can inform the draft policy?

14 PUBLIC CONSULTATION

14.1 Clinton Devon Estates has had links with Exmouth for many centuries and it is their wish to make a positive contribution to the community and leave a lasting legacy. It recognises that in order to do this it is important to carry out a robust and genuine consultation with the local community on any proposals for development. In December 2011 it set up a website, www.plumbparkconsultation.co.uk, outlining their plans for this site and inviting feedback online. Additionally they sent a newsletter to 1,600 local residential and business addresses which invited people to leave their comments on the website or in writing to a FREEPOST address. This activity, well above and beyond any statutory requirement at this stage in the planning process, demonstrates Clinton Devon Estates' very real commitment to work with the local community from day one, to achieve the best outcomes possible.

15 CONCLUSIONS

15.1 In a nutshell we say:

- There is not enough housing allocated for the District;
- There is not enough housing allocated for Exmouth;
- There is an acute affordable housing problem in the District reflected in Exmouth;
- Of 873 dwellings (already built or with planning permission) that the Council is counting towards its delivery target for housing (and affordable housing) for Exmouth in the plan period only 57 houses are affordable (that's 6.5%); and
- More housing has to be allocated for the District and for Exmouth which should have 25% of the total allocation from the 40% earmarked for towns in the Local Plan.

15.2 Of all the strategic sites that have been proposed for Exmouth, Plumb Park, Littleham is closest to all of the town centre, seafront, major public transport hubs and major employment provision. These facts, which are supported by our evidence, show that if Exmouth has any aspirations to be a self-sustainable town then its allocation should be favoured over all others.

16 APPENDIX 1 LAND AT LITTLEHAM

