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Your ref:

My ref: GMS/EDLP

Dear Mr Dickins

Consultation on the New East Devon Local Plan 2006 – 2026, Consultation Draft December 2011.

Thank you for consulting Dorset County Council on the above document. I enclose the comments of the County Council which relate principally to the spatial strategy of the New Plan and its potential implications for this Council. Detailed comments on matters relating to the Dorset and East Devon World Heritage Site have already been forwarded to you by Richard Edmonds, Earth Science Manager at Dorset County Council.

General Comment

East Devon District Council is to be congratulated on preparing a comprehensive plan for the District which takes a positive approach to providing for housing and employment needs and incorporates detailed advice on how it proposes to address Neighbourhood Planning. We have the following comments:

Structure of the Plan

Whilst recognising the advantage of combining the broad strategy and detailed development management policies in a single document, we found the layout of the draft plan somewhat difficult to follow. The introduction of detailed individual town chapters after Chapter 6 tends to disrupt the flow of the strategy. As there are also individual development management policies for specific towns in Chapter 21 it means that proposals affecting particular settlements are split between two parts of the plan. Whilst appreciating the difficulty of combining two separate documents into a single plan during this period of uncertainty over the process to be followed, we consider the Plan may read more easily if the detailed discussion of individual settlements follows the broader explanation of the spatial strategy including environmental and climate change policies and the delivery of infrastructure.

Vision

The Plan includes an ambitious vision that seeks to provide balanced communities with jobs that help raise average incomes and homes to meet the affordable housing shortage across the District. A major "Growth Area" is planned to the east of Exeter (known as the West End). This includes proposals for the development of a new settlement "Cranbrook", as well as strategic employment allocations, a science park and airport with a multi-modal freight terminal to service the expansion of Exeter.

It is recognised that partnership working will be necessary to provide the essential infrastructure required to support the development programme.

However the plan does not clearly explain the strategic policy background for the wider area – including the thinking behind the Growth Area designation or the demographic trends that have informed its proposals for growth across the District. As the Regional Guidance for the South West and the Devon Structure Plan will be abolished under the Localism Act, the Plan might benefit by filling in more of the sub-regional background that these documents originally supplied.

Spatial Strategy

Chapter 6 sets out details of the overall levels of housing and employment development being proposed in East Devon as well as the approach to sustainability and environmental protection. The Plan proposes a lower level of housing development (15,000 dwellings between 2006-2026) than was proposed in the draft Core Strategy published in 2010 (16,400 dwellings). However it proposes a similar level of land for employment development (180 Hectares, as opposed to 186 Ha).

Since the publication of the last consultation document EDDC have commissioned consultants (Roger Tym and Partners and Vicery Holman Property Consultants) to undertake a study of high level need and demand for housing and employment development. The final report ¹ is included in the evidence base for the plan. It makes recommendations on the level of employment land required across the District (excluding provision for the Growth Area). This provides useful background material on which to base the housing and employment strategy.

However the Plan does not clearly explain why, despite the lower level of housing proposed such a high level of employment land is still needed. Nor does it examine the implications of the scale of growth proposed in terms of increases in traffic and demands on infrastructure for the District and neighbouring areas. (An infrastructure Delivery Plan is yet to be prepared.) Links between the evidence produced, the development of different options and the preferred strategy are not easy to follow.

In the last round of consultation we noted our concerns at the scale of employment land provision made in the plan, which at that time considerably exceeded the requirements set out in the Devon Structure Plan and Draft RSS (186Ha proposed against 100Ha required). These concerns still stand.

The evidence provided in the Housing and Employment study concludes that some 32Ha of land should be allocated for B space uses (offices and storage) for the District as a whole (excluding the Growth area). This recognises that growth in other employment categories would be likely to occur in town centres or on specific sites rather than on allocated employment land. However the Plan proposes some 54 Ha of additional land (excluding the Growth Area) on top of the 41 Ha already committed.

The Housing and Employment Study goes on to state² that although the recommended total (32Ha) may be significantly less than previous allocations, there will also be churn in the existing

¹ East Devon Housing and Employment Study Final Report Dec 2011.

² Para 8.20 East Devon Housing and Employment Study Final Report Dec 2011.

space which is not included in this figure. Also that adding further supply by allocating too much land may only depress values further and undermine market confidence.

We agree with this assessment and confirm that our concerns with the high levels of growth proposed include:

- The proposals appear to disregard the evidence provided in the “Housing and Employment Study” by R Tym and Partners regarding the need for employment land (B use space) in East Devon District.
- The heavy concentration of employment related development (around 85ha) in the “West End” of East Devon seems to be largely unrelated to the needs of the existing population, or of the proposed new town of Cranbrook.
- The reliance placed on inward investment requires more substantial justification. Reference is made to mobile projects of a science based or “high tech” nature; such projects are always few in number, much sought after by local communities throughout the UK and abroad, and never more so than during a recession
- There must be doubt as to the adequacy of existing or proposed infrastructure to support such a scale of development, particularly transport links between East Devon and West Dorset. The A35 between Bridport and Lyme Regis is already subject to significant summertime delays and the addition of more traffic demand will only serve to exacerbate these issues.
- The scale of HGV movements on the A35 is already an issue of serious concern to residents along the route. The impact of this is exemplified by the designation of Chideock as an Air Quality Management Area (AQMA) due to the unacceptable levels of pollution in the village. The development proposed is likely to increase HGV demand along the A35 in West Dorset and will negatively impact Dorset residents along this corridor.
- The attractiveness of the proposed employment locations to long distance car commuters including residents of Dorset would be likely to increase problems of congestion, and make more difficult the achievement of targets for reduced carbon emissions, in particular those relating to the Chideock AQMA.
- Draft Strategy 26 “Future jobs and employment land provision” of the consultation document refers to an expectation that larger scale housing allocations will be matched with new jobs (around 1 job for each new home built), so that people have the option of not needing to commute long distances to work. This analysis appears to ignore the “multiplier effect” by which “basic” (wealth creating) jobs support additional “non-basic” population serving jobs. The multiplier effect, if unplanned for, may result in increased commuting and congestion, and/or in-migration and housing shortage.
- There is no indication of any phasing programme for the release of employment sites that would enable ongoing monitoring and assessment of the take up of land and whether the plan’s objectives were being achieved.

Other concerns:

1) Development likely to increase traffic on the A35.

Dorset County Council’s other concerns relate to proposals for development that could potentially increase the amount of traffic on the A35 and in the towns and villages along that route in Dorset.

We note that, alongside proposals for modest growth in Seaton and Sidmouth, a new strategic allocation of 650 dwellings and 8 hectares of employment land together with a north-south relief road is proposed in Axminster. Whilst acknowledging that, because of the severe constraints on development in Lyme Regis, there may be a case for some limited housing development in East Devon to help address local housing need in the wider area, we consider that the scale of new housing and employment land proposed in Axminster has not been adequately justified, nor have the implications of such a level of growth on local infrastructure been explained.

In particular we consider that:

- The proposed level of employment land provision is likely to attract commuters from West and Central Dorset resulting in the exacerbation of existing problems on the A35 and within Lyme Regis.
- The allocations proposed for Axminster, Seaton and Sidmouth are a cause for concern. Increased commuter and visitor traffic on the complex of narrow roads in this area, and possibly on Lyme Regis's narrow streets, would clearly have implications for transport planning, which would need to be dealt with on a cross-boundary basis. At the very least there is a need for signage to direct through traffic onto alternative routes avoiding Lyme Regis.
- The proposed North-South Axminster relief road is likely to unlock previously constrained leisure trip demand for Lyme Regis from towns such as Chard, Ilminster and Taunton and also make the area more attractive to visitors travelling from further a field along the M5. Lyme Regis is subject to severe transport problems which centre on parking and highway capacity, but improvements are limited by the historic layout of the town. Therefore, the unlocking of constrained demand is likely to impact heavily on Lyme Regis with little opportunity for mitigation.
- During the tourist season the Town and Crown A35 roundabouts in Bridport are often the locations of significant delays. Increased traffic is likely to result in greater frequency and magnitude of such delays. The proposed allocations at Axminster and Honiton are particularly significant in this regard.
- So that we can reach a better understanding of the likely increase of trips on these corridors, we would be grateful to have sight of transport models and evidence documents that have been produced, and particularly the gravity model of trip origins.

2) Difficulties in education provision

We have concerns that the proposed increase in housing at Axminster could result in additional pressure on Woodruffe School in Lyme Regis. Woodruffe School already accepts considerable numbers of pupils from Axminster – largely driven by parental preference. We note that Axe Valley School in Axminster is full in years 8,10 and 11, so are concerned that pressure for places at Woodruffe School is likely to increase – particularly if the town grows as proposed. We also note that the Exeter and East Devon Infrastructure Study – Stage 3 Report notes on page 229 that expansion of the existing secondary school in Axminster is “Essential”. However the Draft Strategy 15 in respect of Axminster makes no mention of the need to expand secondary education facilities.

We are concerned that the need for additional educational provision should be addressed in the assessment of infrastructure needs in Axminster, and that Community Infrastructure Levy/ Section 106 agreement contributions from new development should be targeted to help meet this need. If new development adds to the pressure on Woodruffe School we would welcome the ability to call on a proportion of any contributions made.

Conclusions

East Devon District Council's positive response to the need for economic development is to be welcomed, but we have some serious concerns regarding the sustainability of the employment proposals in the draft plan. We have a particular concern that employment land provision at 180 ha so far exceeds the level indicated by the former strategic policy (about 100 ha for East Devon as a whole) and the recommendations of the recent study by Roger Tym and Partners.

We also consider that land allocations should be so distributed as to maximise self-containment within East Devon and to discourage long distance commuting particularly in respect of unsuitable rural roads. If transport modelling indicates that such commuter trips are unavoidable then we would suggest that opportunities for joint working on infrastructure planning and provision, between the respective county and district councils, should be explored. The pooling of developer contributions to finance essential network improvements may offer a way forward. We are pleased to note in this respect that Draft Strategy 44 indicates that you will prepare an

Infrastructure Delivery Plan to be considered alongside the Submission draft version of the Local Plan.

Under the new “Duty to Co-operate” introduced in the Localism Act we would welcome discussion with your council about the possible implications of the levels of development proposed in the plan and how best to address your ambitions for growth, particularly in the Axminster area, without causing additional problems for local infrastructure.

Yours sincerely,

Gill Smith
Senior Planning Officer
Dorset County Council



Director for Environment Miles Butler



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