

Response to EDDC Draft LOCAL PLAN 2006 - 2026
from **BROADCLYST PARISH COUNCIL**

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General Comments		Paragraph/page references
A.	<p>There is too much development concentrated into one area, rather than uniform development across the region, with Broadclyst parish shouldering the brunt of it.</p> <p>When the Cranbrook development boundary was originally agreed, it was stated that there would be no need for further development; however, Westclyst (Pinhoe) is being expected to absorb 800 additional dwellings in an area with inadequate infrastructure for the first 450 homes. This is effectively extending urban Exeter, but with Exeter City proposing an additional 5,000 homes of its own, this should not be necessary.</p> <p>We understand the rationale for utilising the West End of East Devon, with its flat land and good transport links, but Westclyst is an unnecessary option and so we strongly oppose the 800 additional dwellings in the Local Plan.</p>	<p>3.14</p> <p>7.7</p>
B.	<p>A large part of the proposed development will result in the loss of high-grade agricultural land, at a time when agricultural land is at a premium. Once developed, this high grade agricultural land can never be utilised for future food security.</p> <p>A high proportion of the whole county of Devon's high-grade agricultural land is in our area East of Exeter. The Growth Point is underway, however, EDDC should minimise the <i>unnecessary</i> loss of additional high-grade agricultural land in the Local Plan up to 2026 and looking further to 2031 (Cranbrook expansion post 2026 – additional 1,500 homes)</p> <p>We have concerns that alternative areas for development have not been sufficiently researched (brown field & low-grade agricultural land), in order to fulfil: "Local Plan policy specifically seeks to conserve and protect the highest grades of agriculture land".</p>	<p>EN14</p> <p>Map p44</p> <p>21.34</p>
C.	<p>The earlier stages of the EDDC LDF (2005 – 2008) were driven by the Regional Spatial Strategy, however this has since been revoked and housing proposals in the Draft Local Plan should be amended to reflect current projected requirements.</p> <p>The independent Tymms Report (Oct 2011) advised that assumptions regarding growth were based on 'flawed Net migration figures'. Tymms' report indicates that the Draft Local Plan figures of 15,000 dwellings are 2,500 – 3,000 too high.</p> <p>As there is no need to continue to be guided by the revoked RSS figures, we would support reducing the dwellings figure from 15,000 to 12,500 in the 2006 - 2026 period</p>	<p>P 29: Draft strategy 1</p>
chapter	Comments on specific chapters	Paragraph/page references
3	We support your aims to 'safeguard the rural country' and 'Our strategic allocations and policies will ensure that each community and settlement in East Devon will retain its distinctive character ...'	<p>3.4</p> <p>3.6</p>
5	We support your commitment to 'be responsive to the views of Parish Councils ... listening to community wishes and aspirations for their area'	<p>5.2</p> <p>5.8</p>

7 EXTENDING CRANBROOK TOWN BOUNDARIES - planned proposed Cranbrook expansion site at the West End to contribute to the increase from 2,900 to 6,000 total dwellings.

P44

We have strong reservations that this is ribbon development creating a long urban corridor, eventually from Alphington to Whimble (excepting 2 minor strips) – contradicting your aims: [3.6] [3.11] [21.5 & 21.6]

(Area A & B) this area is considered unsuitable as it includes:

- parkland with trees covenanted
- a listed building
- flood area
- Private road to Blue Hayes... only agricultural traffic allowed through
- Part of the south of this area is exposed to noise from airport, and not thought suitable for residential housing
- Good agricultural land, which should be preserved for future food security
- The 'village centre' of Cranbrook is skewed to the East, and the proposed extension to the West would put houses up to two miles from the centre, making walking to the village facilities unlikely. This would call in to question the entire 'eco' designation of the town which are normally built in a hub and spoke fashion allowing easy access to the centre facilities.
- The centre of the existing Cranbrook boundary is already towards the west and extending into Area A will further encourage Cranbrook residents to align themselves with Exeter for facilities, rather than the new town Centre.

Areas A, C & D are proposed to provide additional 3,100 homes in an area smaller than Cranbrook's existing boundary – which is designated to take 2,900 homes.

21.6

We strongly object to the density planned for Area A, considering all the limitations stated above.

We advocate retaining Area A as a green wedge between Cranbrook Town and Urban Exeter. This would further help to avoid Broadclyst's forced coalescence with the new town, by retaining the Station road community and Broadclyst Station's businesses within Broadclyst (helping to maintain its own sustainability). This is also our reason for not supporting a further extension of Cranbrook's electoral boundary West, across Station Road.

Should the extension of Cranbrook's boundary extend to Area A, we would ask for the following mitigation measures, for public safety and to encourage the use of cycling and footpaths:

- Cycle/footpath access from Broadclyst to Cranbrook station in first phase, not after 4000 houses.
- Must ensure safety improvements along Station Road; possibly including a pedestrian/cycle bridge at Broadclyst Station

7 Blackhorse / Redhayes

This development area is intended in the later phase 2021 -2026, so that infrastructure will be in place before development.

Draft Strategy 10
7.40

We stress the need to ensure that development is post 2021, to allow Cranbrook Town development to become established first.

7	<p><u>Pinhoe / Westclyst</u></p> <p>We oppose the allocation for 800 additional homes proposed for ‘Pinhoe’ for the reasons stated above (<i>general comments A & B</i>). Also, this is an area where existing infrastructure cannot absorb these levels of housing</p> <ul style="list-style-type: none"> ◆ B3181 is a traffic bottleneck in this area already (<i>and also a designated alternative route for M5 traffic in emergencies</i>) <p style="padding-left: 40px;">ref: Appendix 1 (attached)</p> <ul style="list-style-type: none"> ◆ Local schools cannot take extra children and there is no primary school secured for the first 450 homes. <p>“The Sustainability Appraisal flagged potential problems with development North of Pinhoe on a number of environmental and community facility fronts”.</p> <p>We would ask you to apply your Balanced Communities strategy 4 to the above.</p> <p>Also, reference to this area proposed for development is technically not Pinhoe (within Exeter City Boundary) and we recommend using its correct name of Westclyst, East Devon.</p>	<p>7.7</p> <p>7.45</p> <p>7.46 & 7.47</p> <p>7.44</p> <p>Draft Strategy 4 P37</p>
7	<p><u>Intermodal Interchange Facility</u></p> <ul style="list-style-type: none"> ◆ The name should be changed, as the Rail Head would seem to be financially non-viable now. The area is road vehicle freight warehousing. The Intermodal concept was a large part of the vision to reduce Carbon emission; but this is a wasted opportunity. ◆ We would also ask that the large warehouse facility development be included as employment land and not transport, as stated. 	<p>7.49</p> <p>3.5</p>
7	<p><u>Science Park</u></p> <p>We have always supported the development of the Science Park and continue to do so.</p> <p>We would point out though, that as the Science Park will be the flagship development to attract high skilled employment, we would suggest leaving future options open for expansion between phases 1 & 2, rather than infilling with housing.</p>	<p>7.8 & 7.52</p>
15	<p><u>Broadclyst additional housing proposal</u></p> <p>We support additional housing in the village to meet local demand, especially “The 5% growth rate is aimed at meeting the needs of local residents with a strong emphasis on the achievement of affordable and sheltered housing ...”</p> <ul style="list-style-type: none"> ◆ However, we would ask you to include the recent planning permissions granted as counting towards this allocation of 30, reducing the total new developments to be granted within our development line from 2012 – 2026. <p>This should also take into account the lack of non-National Trust land available for development within Broadclyst.</p> <p>The figure of 30 should include the new developments granted since 2006 (starting date for this Local Plan):</p> <ul style="list-style-type: none"> 13 - at Kingdom House (2011) 3 – Old Baptist Chapel (2011) 4 – Old Coach Road (2011) 2 – Townend: Pippins (2009) & Clyston (2011) 1 – Sunnyhayes, Heath Hill (2009) <ul style="list-style-type: none"> ◆ We would urge EDDC to ensure that S106 funding is secured for “affordable and sheltered housing” for local residents, as of these recent 23 dwellings granted planning permission only 2 can be regarded as ‘affordable’. 	<p>Draft Strategy 22</p> <p>15.16</p>

16	Community Facilities & Infrastructure EDDC should ensure sufficient developer contributions towards vital community facilities, avoiding overload on existing school, health and road infrastructures. In addition to S106 funding, the CIL will play an important part.	16.35 & 16.36
18	Natural and Built Environment We fully support the “need to accommodate development in our district ... in a way that minimises adverse impacts and enhances & improves landscapes ... ensure that new developments ... take full account of the local natural and cultural heritage.”	18.33 18.36 Draft strategy 40
21	Development Management Policies We support the Policy S5 and in particular: <ul style="list-style-type: none"> ◆ the great important of green wedges to prevent ‘coalescence of adjacent or neighbouring settlements, villages or towns’ ◆ tree planting/retention 	21.5 21.6 21.10 - 21.13