
From: jamescarthy
Sent: 09 March 2021 23:41
To: Matthew Dickins
Subject: RE: New Local Plan

Hi again Matt,

A shame that we could not meet face to face for understandable reasons but thank you for the time spent in discussing the new Local Plan.

As mentioned, I am afraid that I do not believe that a Call for Sites is the right way of making a Plan for many reasons but an important one being that many landowners, because of the predominance of anti- development attitudes among many councillors and strong lobby groups, do not want to be seen as promoting development in their area. I know from experience that if it was considered by professionals that their land was suitable for development most, if not all, would be prepared to allow it to be included in the Local Plan.

In our discussion I did give you two real examples where public statements made by individuals purporting to block development was not mirrored by their actions when those developments did eventually proceed.

Unfortunately, the two previous Local Plans directed the majority of development to Cranbrook and then the West End. Records show that this has failed but of course Members welcomed it because that avoided land being allocated in their area which would have raised objections from their NIMBY voters.

I think I can do worse than drawing your attention to my response to the Colyton Neighbourhood Plan consultation and attach a copy. You will note my proposal on page 5 as to what action Colyton (and Colyford) should take. **I believe that this would be a sensible format to produce the new District Local plan.**

I am still of the view that the majority of the sites I submitted for the current plan ought to be considered suitable for development in the new plan and for ease list the references previously given.
E004, E089, E142, E145, E209, E210.

Notwithstanding this I still believe that you and your colleagues should be proactive and draft a plan and identify sites that ensures East Devon gets the development that it needs, thereby preventing further loss of sustainability and indeed also including measures to increase the sustainability of the settlements.

Education is ever more critical and I trust you will have a meaningful dialogue with those responsible for providing it. I have raised the matter of parking at Colyton Primary and whether the school should be relocated, this is important but similarly I think there are other primary schools in the District that are short of space and or have inadequate

premises and each should be examined and confirmed whether the site is suitable for the foreseeable future and if not an allocation made for a new site unless it is clear that there are plans for amalgamation with another school.

You will remember my proposal for a new access to the Grammar School at Colyford to remove the very real highway safety problems that exist. The danger has not gone away and in fact has got much worse as the school has grown substantially during the period. There is of course a strong anti-development lobby in the village which has also grown as housing has been lost to locals, so strong outside intervention will be required.

I believe that very little needs to happen to Colyford to enable it to satisfy the criteria for sustainability. Furthermore, I believe it has all the attributes to become a "Garden Village" and the attached schematic drawing, although out of date, might be a useful starting point.

Penultimately, for some time Cranbrook has in fact been meeting much of the shortfall in the Exeter Plan with perhaps 50% of the residents coming from there. There was of course no allowance for the Exeter shortfall in the numbers and that of course means that the supply of houses for East Devon has been reduced by a significant amount. This gives rise to my second recommendation:

I would recommend that the Council commissions independent research on Cranbrook to establish exactly how much of the development is meeting Exeter's unmet need so that monitoring of the EDLP is truly accurate. Adjusting the figures to accurately reflect those that are meeting East Devon's need would allow a reallocation of the numbers lost to Exeter and that is likely to cover a significant amount of the need that will inevitably arise from the objective assessments of needs for each of the settlements of East Devon.

My final point is on affordable housing. You may have already heard my argument that a modified St Ives Policy H2 could work and I certainly believe would find favour with young families of the District. I attach a note on the subject and would be interested to get a view from the Council's legal department as to the practicalities of introducing such a scheme.

I wish you well in your work and do hope that some of my proposals will find their way into your early draft.

Kind regards,

Jim Carthy



NEIGHBOURHOOD PLAN COMMENT FORM

All information is available online at:

www.colytonparishcouncil.co.uk

Colyton Parish Neighbourhood Plan Regulation 14 Consultation

OFFICIAL USE ONLY

DATE REC'D:

9am Monday 5th October 2020 – 5:00pm Monday 14th December 2020

The information you provide will be held on a database and used to assist in the preparation of planning documents.

The information will be used in accordance with the Data Protection Act (2018) and the data privacy policies of Colyton Parish Council.

We regret that we are unable to process any responses supplied without contact details.

Please tick as appropriate:

Responding as an Individual	X	
Responding on behalf of an Organisation		<i>Organisation:</i>
Agent Responsible on behalf of a Client		<i>Client:</i>

Please complete in BLOCK CAPITALS

		Agents details (if applicable)
NAME:	Jim Carthy	NAME:
JOB TITLE/DEPT:		JOB TITLE/DEPT:
ORGANISATION:		ORGANISATION:
ADDRESS:	████████████████████	ADDRESS:
POST CODE:	██████████	POST CODE:
EMAIL:		EMAIL:

Comments must be received no later than 5:00pm on Monday 14th December 2020
Comments received after this time may not be considered

Please return to the Parish Clerk
By email: colytonpc@tiscali.co.uk

By post or in person to:
Colyton Parish Council
Feoffees Town Hall
Market Place, Colyton
EX24 6JR

Please tick/complete as appropriate:

Do you wish to:

Comment	<input checked="" type="checkbox"/>
Support	<input type="checkbox"/>
Object	<input checked="" type="checkbox"/>

Are your comments:

General	<input checked="" type="checkbox"/>
Specific	<input checked="" type="checkbox"/>

If your comment is specific, to which Section/Policy does it refer;-
Page/ Section **Pages 19, 20 and 42**
Policy No. **Coly 4 Green Wedge**
Map 8

Please make your comments here and indicate any changes you are seeking. Additional sheets may be attached to this form:

The document is very well presented but, with respect, I do not believe it can be considered a Plan in the real sense. The document identifies a number of serious issues but does not appear to propose any firm actions or proactive measures to deal with these.

In my view major problems for Colyton and Colyford that require urgent solutions include:

1. Lack of market housing that is affordable by local people many of which are disqualified from “affordable housing” as they are not classed as being “in need” by Devon Home Choice.
2. Shortage of equity share housing that will enable the occupants to get on the home owning ladder with the option to staircase out in the future.
3. A shortage of local trades people, artisans, retained fire crew, youth leaders and the like, resulting in part from the inability to purchase a house locally.
4. Severe shortage of parking and no safe drop off area for the Primary School.
5. Lack of off-street parking in many areas for residents including, but not exclusively, The Butts, Sidmouth Road, King Street, Church Street, Lower Church Street and Rosemary Lane and this creates severe traffic flow problems for all and potentially life threatening blockages creating delays for emergency vehicles.
6. There is no safe Coach and Bus parking for the Grammar School resulting in a serious danger to all road users of the A3052 between 15:20 and 15:50 on all school days.
7. Whether or not Colyton is Sustainable at the moment is questionable but there is no doubt that it is becoming less so by the day. Colyford, by the EDDC’s crude measure is not sustainable but in many ways it is. It certainly it has the potential to be highly sustainable and one aim of the Neighbourhood Plan should be to make it so and similarly improve Colyton’s sustainability.

The Green wedge as drawn is clearly designed to stifle development and I firmly believe it should be removed altogether. There are sufficient Local Plan Policies, the AONB being just one, to give Colyton and Colyford the protection that it needs.

Map 8 incorrectly shows the extent of the Peace Memorial Playing Fields and has omitted the Football Field and Play Area at Road Green and the Play Area off Whitwell Lane.

Should the Steering Group decide to include possible solutions in the Plan I would welcome the opportunity to make constructive proposals. I set out below some further comments and recommendations.

Colyton Neighbourhood Plan Recommendations by A J Carthy.

Background

There is little doubt that after Covid both Climate Change and Housing will feature at or near the top of the Government's agenda. There are already moves in place to increase housing and East Devon is likely to have to provide for much more than it is at present.

In both the 1995 - 2011 and the 2013 -2031 Local Plans, development was focused on the West End of East Devon and mainly in Cranbrook. For a number of years leading up to 2016 the Council could not demonstrate a 5 year land supply and that gave rise to consents for over 3000 dwellings been granted, Contrary to Policy, in East Devon, many on very unsuitable sites.

There is little doubt that almost half the dwellings at Cranbrook are meeting Exeter's need and for which no allowance had been made, so in reality the provision for East Devon is very much less than set out in the Plan and only a fraction of what is required.

Because of an anomaly in the figures, East Devon is able to demonstrate that it is currently has a 5 year land supply, however, it is doing that while only achieving 73% of housing numbers in the Plan despite being able to include those meeting Exeter's need and the large number built that were unplanned. If objectively measured, the Council would not have a 5 Year Land Supply.

When the current Local Plan was drafted, land for some 740 houses was to be allocated to Villages, however, the Inspector, Mr Thickett, decided that the 5% measure used was too crude and allocation should be more objective. As a result the Council withdrew all allocations for Villages and while an increased allocation was made to the West End, suggested that the numbers would be produced through the Neighbourhood Plan process. **Colyton was classed as a Village in this regard.**

The Villages Plan was subsequently produced without the benefit of any objective needs assessments and in my view, crazily, the Inspector Beverley Doward raised no query on that when examining the soundness.

It is clear from the Neighbourhood Plans produced to date, apart from Beer which has made one allocation, there has been no serious attempt to provide allocated sites for housing, so the Villages will not have the housing promised in the original plan and young local people are the ones that are suffering and will continue to do so as a result of that.

From 1971 to 1994 Colyton benefitted from an average of 17 new houses per year as well as a number of industrial units, had that not happened then the place would be much less sustainable than it is today, with fewer services and there is a good chance that the Library and much else would have been lost.

Current policies have restricted development and since that time the average has dropped to perhaps 2 per year and 20 of those was on an Exception site on the western skyline.

If Colyton is to be sustainable into the future and avoid having development imposed upon it, then I would recommend that a fresh look is given to the Plan and allocations for parking, employment and housing are recommended, based upon an objective needs survey.

We know already that there is a move to build more affordable housing on an Exception site and that means that the plan makers have abdicated their responsibility by ignoring a need that has been established and not proposing an appropriate allocation.

There is a hidden agenda for relocating the Primary School. While the Local Education Authority has no plans for this, Parish Councillors have been heard to state that residential development should not be considered on the land adjacent to the Peace Memorial Playing Fields because it is the Council's preferred site for relocating the Primary School. If it is the wish of the Parish and the LEA indicates it is feasible, then it should be included in the plan with that site or other suitable land identified for it and the present school reallocated for other use.

On 16th November Christopher Pincher, housing minister, spoke at an online housing conference and below is an extract from the report which I believe underlines my thoughts that if Colyton does not make the allocations to fulfill its needs then those allocations will be imposed; local people want to live in Colyton and Colyford and not Cranbrook being the **anywhersville** that he refers to.

The housing industry is “at the forefront of a seismic shift” in the way people are now viewing their homes and communities, the housing minister Christopher Pincher said today (November 16).

Speaking at today’s online Housing Market Intelligence Conference, Pincher said the government had placed housing at the centre of its recovery ambitions.

He reiterated the government’s intention to reach its homes target, including through changes to planning and moves toward design-led, green homes. Pincher also noted the robustness of the housing market.

“We’ve lost ground due to the pandemic. But the market has proved itself to be more resilient than people expected,” he said. “There is no question we need to go further and faster to deliver the commitment of 1 million homes by the end of this parliamentary term.”

But these new homes could not be “anywhersville but where people want to live”.

Pincher said the pandemic had given many people “a new and profound appreciation of their homes and communities”.

“We hope with government support that this will be an opportunity not just to build, build, build, but build better and more beautiful and build communities that not only recover but are stronger and brighter.”

In the light of above I believe the Way forward for Colyton should be to:

- 1.1. Adjust the Built-up Area Boundary to fairly reflect the physical Built-up Area.**
- 1.2. Carry out an objective Needs Assessment for all types of Housing, Employment, Education, Health and Parking.**
- 1.3. Make proposals for sustainable allocations to cover as much as possible of the Assessed Needs.**
- 1.4. Propose new Defined Development Boundaries that reflects the existing scale and core built form of the settlements and seek expansion to facilitate additional development in sustainable locations to meet the identified needs, respecting the distinctive character of the settlements and sensitivity to landscape setting.**
- 1.5. Ensure that all options are on the table.**

East Devon Local Plan – Affordable Housing – Modified St Ives condition.

There is no doubt that the Affordable Housing Policy has failed to deliver and furthermore I do not think its aims are correct. Despite Strategy 34 numbers are pitifully low only a fraction of target.

I believe there should be less focus on Affordable Housing but a real commitment to provide **Housing that is Affordable**. That really is a function of supply and demand.

If one studies the policies of Government we find that most are self-defeating, a recent example was the **help to buy** and that led to a marked increase in house prices and multi-million bonuses for Housing Development company bosses.

I have direct experience with CLT and that clearly illustrated that in most villages in East Devon local people are unable to buy houses because they are simply not affordable. The sad thing is that many of these people do not qualify for affordable housing despite the fact that local houses are well beyond their price range.

St Ives have a **Policy H2** which seeks to condition new homes so that they must be the main residence. It is very early days but they have resisted 2 legal challenges although there does appear to be a reluctance for mortgage companies to provide mortgages on the properties.

I have for some time been advocating a radical approach to affordable housing and I do believe that a modified St Ives Policy could be made to work and would really make new housing affordable while also providing social rented housing.

I would propose that for all Villages new housing could be conditioned. Indeed this might be widened to include Sidmouth, Seaton and Ottery or indeed all new housing outside of the West End new community and Axminster.

I think that the St Ives condition is good but could be widened to add that purchaser must have a local connection but I think that would have to be by a Section 106 agreement rather than conditioned.

Where my suggestion differs from St Ives it would allow the condition to be bought out at a rate considered by the Council perhaps 30% of the sale price and that money would go to the Council or a Registered Housing provider specifically to provide social rented housing.

That Buy-out clause should remove the reluctance from mortgage companies as they would know that as a last resort the property could be sold on the open market and the Council paid off out of the proceeds.

I would stress that it would be important that the Council sets a meaningful percentage for the buy-out, not just to increase proceeds for affordable rented houses but also to ensure that purchasers do not play the system. Indeed it might be sensible to have two figures one for buying out the local connection and a higher one for the property being the main residence.

St Ives

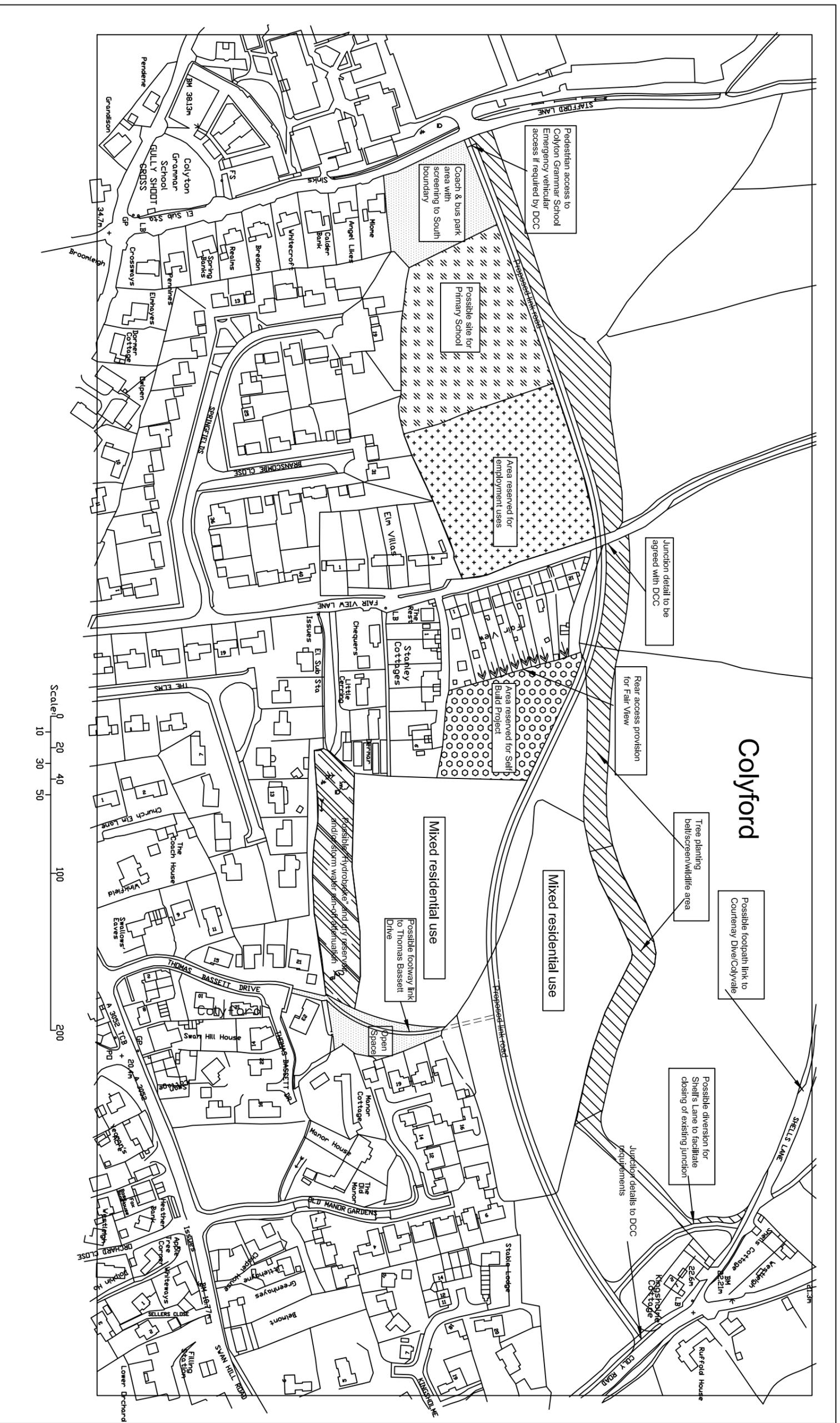
H2 Principal Residence Requirement

Due to the impact upon the local housing market of the continued uncontrolled growth of dwellings used for holiday accommodation (as second or holiday homes) new open market housing, excluding replacement dwellings, will only be supported where there is a restriction to ensure its occupancy as a Principal Residence.

Sufficient guarantee must be provided of such occupancy restriction through the imposition of a planning condition or legal agreement. New unrestricted second homes will not be supported at any time.

Principal Residences are defined as those occupied as the residents' sole or main residence, where the residents spend the majority of their time when not working away from home.

The condition or obligation on new open market homes will require that they are occupied only as the primary (principal) residence of those persons entitled to occupy them. Occupiers of homes with a Principal Residence condition will be required to keep proof that they are meeting the obligation or condition, and be obliged to provide this proof if/when Cornwall Council requests this information. Proof of Principal Residence is via verifiable evidence which could include, for example (but not limited to) residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools etc).



Proposed New Access to serve Colyton Grammar School with provision of Bus and Coach Park
 Schematic layout incorporating possible new Primary School

East Devon Villages Plan
 Updated September 2016
 Representor 3215