



East Devon District Council Local Plan (2021
– 2040) Issues and Options Consultation
Response
On behalf of The Chancery Land Company
(1935) Ltd

March 2021

Quality Control

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1.0 Introduction

- 1.1 This written representation has been prepared by Planning and Design Group (UK) Ltd ('P&DG') and is made on behalf of The Chancery Land Company (1935) Ltd ('our client') in response to the East Devon Local Plan (2021 – 2040) 'Issues and Options' ('the Plan') consultation.
- 1.2 These representations are made in the context of seeking to work with East Devon Council ('the Council') to ensure that an effective and deliverable plan for the area is achieved.
- 1.3 Our client has control of land at Pikes Farm, West Hill, Ottery St Mary which is being promoted for residential development via the Council's accompanying 'Call for Sites' process.
- 1.4 The site amounts to approximately x hectares and could deliver between x and x dwellings along with all necessary infrastructure. A site location plan can be found at **Appendix A** of this representation.
- 1.5 As explained later in this representation, the site has no planning / ecological / landscape or heritage constraints. It is sustainably located for access to West Hill's services and facilities and has existing development on three sides effectively making it an 'infill' site. With appropriate landscaping and the use of materials sensitive to the location, it is considered development on the site could blend successfully with existing development thereby having a minimal impact on the surrounding area, whilst at the same time delivering much needed market and affordable housing.

2.0 Chapter 5: Meeting Housing Needs

Objective 3: To provide high quality homes to meet people's needs

- 2.1 Our client would like to see more ambition from the Council in terms of its housing delivery. The Plan states at 5.2 that:

'The Government set out minimum numbers of homes that should be built each year. In December 2020 the Government advised that the figure for East Devon should be at least 928 new homes per year (but it is subject to year on year review). It is marginally below our current local plan policy that identifies a need for an average of 950 homes to be built each year. It is also considerably lower than the figure of 1,614 homes per year that a now abandoned Government proposal, from autumn 2020, generated.'

- 2.2 Paragraph 5.3 then appears to suggest that the identified 928 new homes per year would be the new housing target for the Council (compared to a current target of 950 new homes per year). The Council's 'Housing Monitoring Update Up to 31 March 2020' shows that in the Apr 19 to Mar 20 period there were 1,065 housing completions in East Devon. The Council therefore is clearly capable of delivering more than 928 new dwellings in a year.

- 2.3 Furthermore, the Plan refers to 928 new homes as an 'at least' target. Government guidance in the National Planning Policy Framework (NPPF) states at Paragraph 59:

'To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.'

- 2.4 If the Council adopts a housing target which is in effect only the minimum it needs to provide, (or relies on Neighbourhood Plans to deliver more than is requested) it is not helping the Government to 'significantly boost the supply of housing'. Further still, the Council should at the very least have a buffer to provide flexibility in housing delivery in case future housing development does not result in the rate of housing completions as planned for / expected.

2.5 It is also noted that the Plan makes reference to the delivery of affordable housing. At paragraph 5.4 it states:

'We have a recent housing study from the consultants ORS that indicates that if we were to meet all current and future affordable housing needs there would be a requirement for around an extra 461 affordable homes each year from 2020 to 2040. This is near to double the level of affordable homes that have been built in recent years.'

2.6 It is difficult to see how the Council could hope to deliver more affordable housing if it were only seeking to deliver the bare minimum of housing need (market and affordable). There is clearly a need for more affordable housing in East Devon, and it is our client's view that the Council should be doing everything in its power to help address this need. This would include having a suitable housing target based on the level of sustainable housing sites available.

2.7 The Plan requests a box to be ticked on the preferred level of housing the Council should be seeking to provide. Based on the above, our client would tick:

'Option 3 - Plan to build considerably more homes each year - A figure of 1,614 homes would align with Governments previous thinking and would potentially result in all affordable housing needs being met.'

3.0 Chapter 11: Promoting Sustainable Transport

Objective 9: To prioritise walking, cycling and public transport and make provision for charging electric vehicles, whilst reducing reliance on fossil fuelled vehicles.

3.1 Paragraph 11.1 of the Plan states:

'The Government define sustainable transport as "any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport". Promoting sustainable transport in new development can have multiple benefits – these include reducing traffic congestion, reducing carbon dioxide emissions, improving air quality, and improving both physical and mental health.'

3.2 The Plan also goes on to explain that further to these benefits those without access to a car (specifically including young people, often older people, and those with disabilities, as well as low-income households) can suffer from social exclusion and difficulty in accessing jobs, shops, leisure, education and other activities. It also states that East Devon has relatively low levels of walking, cycling and public transport, whilst car ownership levels are high. The 2011 census showed that just 16% of households in East Devon do not own a car, compared to a national average of 26% and nearly two thirds of people in East Devon drove to work. This is partly due to the rural nature of much of the district, where access to jobs, services and community facilities can be some distance away (particularly for those in more rural areas).

3.3 The Plan also states that the ability to walk to services and facilities (or to walk to public transport) is a critical factor in determining where development should go. Our client supports the Council in this approach. Within predominantly rural districts it is not always possible to secure development in sustainable locations close to existing services and facilities, so opportunities to do should be supported by the Council.

3.4 The following potential options are identified by the Council:

'Option 1 – Focus new development as small clusters of growth in locations within easy walking or cycling distance of existing services and facilities – This will limit the potential location of new development and will require existing facilities and services to have the capacity to cope with extra customers/users

Option 2 – Focus new development on a small number of growth areas where the large scale of development will support the delivery of new accessible services and facilities - This may require very high levels of development to support facilities, which may overwhelm a small settlement.

Option 3 – A combination of options 1 and 2 – This will enable some growth where existing facilities and services are accessible and have capacity with the remainder focused on growth areas to be developed with new services and facilities.

Option 4 – Do not require facilities and services to be within walking or cycling distance of new development but require them to be available within the settlement - This option would not require access by foot or cycle to facilities and services but would require them to be available locally. It may however encourage car use.

Option 5 – None of the above - Perhaps you think that accessibility by walking or cycling is not a relevant concern?'

- 3.5 Considering the above, our client would support 'Option 1'. That said, the option is a little mis-leading. New development would help support existing facilities and provide additional funding where necessary if some services were at capacity. Existing services and facilities would not necessarily have to have capacity when financial support can be provided to mitigate and create additional capacity to service the development.

4.0 Chapter 13: Developing a Strategy for the Distribution of Development

4.1 Chapter 13 first discusses the 'Settlement Hierarchy' in its current Local Plan. This hierarchy is shown as:

'1. 'West End' - comprising the developing new town of Cranbrook and other large sites at North of Blackhorse and Pinhoe.

2. Seven Towns of – Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Seaton, and Sidmouth.

3. 15 Villages that provide a range of facilities and services - to meet some of the basic needs of their residents and nearby rural areas: Beer, Broadclyst, Clyst St Mary, Colyton, East Budleigh, Feniton, Kilmington, Lypstone, Musbury, Newton Poppleford, Sidbury, Uplyme, West Hill, Whimble, Woodbury. (Colyton is actually a town but on account of its small size and facilities we put it into a 'village' category).'

4.2 The Plan then asks for views on whether this hierarchy should be changed. It provides the following options:

'Option 1: Same hierarchy as current Local Plan: 7 Towns plus Cranbrook and the 15 Villages

Option 2: A hierarchy that retains the towns and Cranbrook but has a lower number of villages that may accommodate development

Option 3: A hierarchy that retains the towns and Cranbrook but has a higher number of villages that may accommodate development

Option 4: Do something different in terms of a hierarchy or not have one'

4.3 It is our client's view that the current hierarchy is most aligned with Government guidance and best planning practice as it steers development to the most sustainable locations. As such, Option 1 is supported. Notwithstanding this however, our client believes that the Council should now revisit its distribution strategy.

4.4 The Plan discusses a number of alternative distribution options for future development. Within the current Local Plan, development is distributed in the following way (and as shown in the pie chart below):

- Vast majority of development directed towards Exeter (shown in blue on pie chart)
- Majority of remainder going to the district's towns (shown in orange on pie chart)
- Small amount going to villages and rural areas (in grey on pie chart)



Pie Chart from consultation document

4.5 The Plan then identifies the follow options for distribution.

'Option 1 - As existing - Continue with a distribution pattern of planned new development that is in line with the current local plan – for 60% of new homes at the West End, 30% in Towns and 10% in Villages and rural areas.

Option 2 – More West End focused – This approach would focus more of the future new house building close to Exeter, perhaps as much as 75%, with the remaining 25% being in town and villages (for example 20% in towns and 5% in villages).

Options 3 – A less West End focussed pattern – This approach would seek to accommodate far less development close to Exeter, maybe as little as 20% of future new homes, with the bulk of new housing, 80% of provision, being dispersed across towns and villages (for example 50% in towns and 30% in villages and rural areas).

Options 4 – an alternative to the above – you may consider that there are different ways or approaches to look at development distribution.'

- 4.6 Whilst our client recognises and understands the Council's current distribution strategy of keeping the bulk development close to Exeter and its major services and facilities, there is risk of over development and market saturation if the Council were to continue this strategy into the next plan. Moreover, settlements elsewhere in the district could start to suffer without new development which would help keep communities functioning, provide affordable housing, offer a choice of where to live in the district and provide support for their own services and facilities.
- 4.7 Our client therefore believes 'Option 3' would provide the best development distribution to benefit the highest number of communities in East Devon.
- 4.8 Our client would also add that it should be the Local Plan which allocates sites in the larger towns and villages. Neighbourhood Plans are subject to referendums and making larger strategic allocations in this way threatens their delivery. There is also the risk that the planning process becomes 'a beauty contest' over which site is preferred by local people rather than rigorous, professional planning appraisal.

5.0 Pikes Farm, West Hill, Ottery St Mary

5.1 As explained above, our client is identifying through the Council's 'Call for Sites' process Pikes Farm, West Hill, Ottery St Mary for residential development.

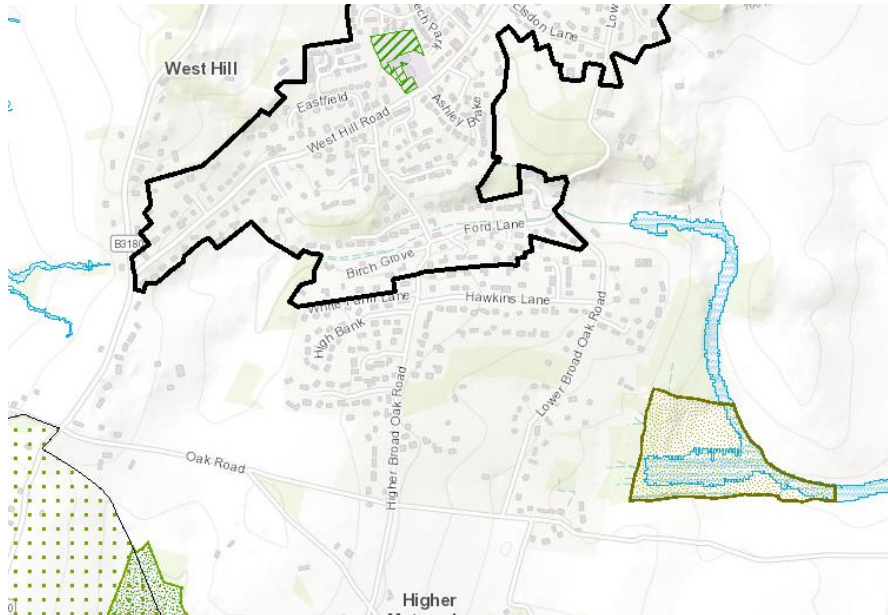
5.2 The site itself is shown below outlined in red:



5.3 The area in green is owned by a different landowner. Our client's site could be easily developed in isolation but there is also the potential to look to working with the other landowner to bring forward a larger scheme.

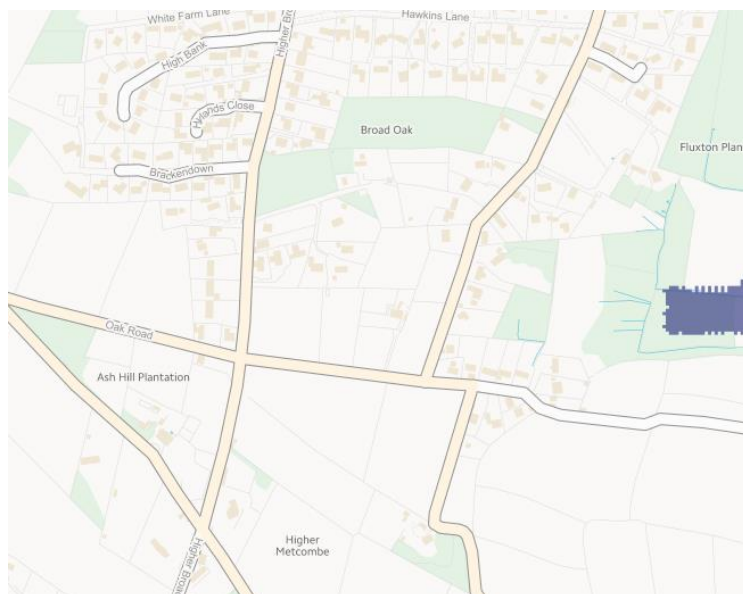
5.4 Below is an extract from the Council's 'Policies Map'. It shows that the site is not covered by any landscape, ecological or historic designations. It is unclear why it currently sits outside of the development boundary for West Hill as it is clearly part of the built-up area of the settlement.

5.5 The site has development on three sides effectively making it an infill site. It will not result in development extending further into open countryside. It is considered that access can be achieved from one of the three roads which border the site.



Extract from Council's Local Plan 'Policies Map'

- 5.6 According to Government's 'Flood Maps for Planning' (extract shown below) the site is entirely in Flood Zone 1 meaning it is at the lowest risk of flooding. The Historic England website (extract shown below) confirms that there are no heritage assets on or near the site.



Government's Flood Map for Planning



Historic England Map

- 5.7 The site is also well located to allow access to the village's services and facilities on foot and by cycle. In summary the site offers potential for residential development in a sustainable location which will not impact on any landscape, ecological or heritage constraints.

- 5.8 It will also help sustain the existing services and facilities and provided much needed market and affordable housing in the area.

6.0 Conclusions

- 6.1 It is the view of our client that the Council should be ambitious in its housing delivery going forward. It should not seek to simply deliver the minimum requirement of housing identified as this will not provide sufficient affordable housing nor is there a buffer if housing delivery is not fourth coming as planned.
- 6.2 Our client believes that the Council should seek to deliver housing in sustainable locations which provides access to services and facilities without the need to use a car.
- 6.3 The 'Settlement Hierarchy' in the current Local Plan seems sensible as it steers development towards the larger most sustainable locations. That said, the current development distribution strategy which allocates most new development towards Exeter should not be carried through to the next Local Plan and it would result in over development in that area and market saturation. Instead, the Council to disburse development to help other settlements thrive and sustain key services and facilities.
- 6.4 Larger strategic allocations should not be established through Neighbourhood Plans. Instead, it should be the job of the Local Plan to make these allocations through rigorous, professional assessment.
- 6.5 Pikes Farm, West Hill, Ottery St Mary is available immediately for residential development. It is not covered by any landscape, ecological or heritage constraints. It is also in Flood Zone 1 meaning it is at the lowest risk of flooding. It is sustainably located for access to services and facilities by foot and cycle and would deliver much needed market and affordable housing in this area.

Appendix A - Pikes Farm, West Hill, Ottery St Mary Location Plan



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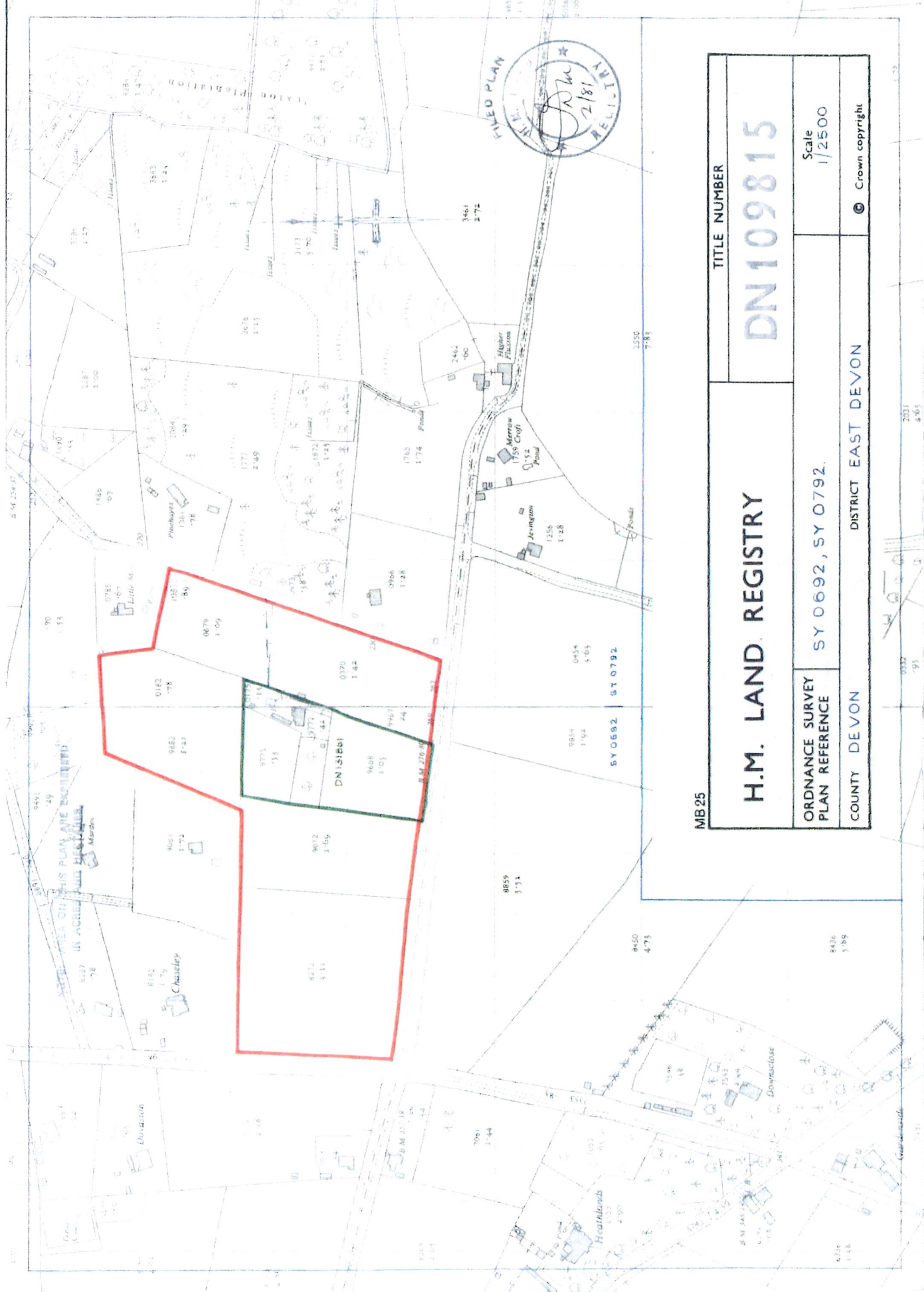
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